PROPOSED RULE PK 50

Carolina Power & Light Company

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Mr. Samuel J. Chilk Secretary U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Attention: Docketing and Service Branch

REVISION TO 10 CFR 50 - EMERGENCY RESPONSE DATA SYSTEM - 55 FR 41095 (OCTOBER 9, 1990) - PROPOSED RULE

Dear Mr. Chilk:

By Federal Register Notice published October 9, 1990 (55 FR 41095), the Nuclear Regulatory Commission requested comments on a proposed rule change to require licensees to participate in the Emergency Response Data System (ERDS). Carolina Tower & Light Company (CP&L) supports a continued voluntary program as described, in concept, in Generic Letter 89-15; therefore, CP&L opposes rulemaking on this issue.

Actual experience during the voluntary program has demonstrated that there are substantial operational concerns which must be addressed. CP&L has reviewed the comments on this subject provided by the Nuclear Management and Resources Council (NUMARC), and endorses the specific NUMARC comments.

If you have any questions concerning this subject, please contact Mr. Lewis S. Rowell at (919) 546-2770.

Yours very truly,

S. D. Floyd Manager

Nuclear Licensing Section

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