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January 28, 1991
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OFFICE OF SECRETARY
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Mr. Samuel J. Chilk
 Secretary of the Commission
 U.S. Nuclear Regulatory Commission
 Washington, D.C. 20555

SECY-90-347 "Regulatory
 Impact Survey Report"
 55 Fed. Reg. 53220 (December 27, 1990)
Request for Comments

Dear Mr. Chilk:

These comments are submitted in response to the Notice of Availability of SECY-90-347 "Regulatory Impact Survey Report," dated October 9, 1990; 55 Fed. Reg. 53220 December 27, 1990). CEI appreciates the opportunity to comment on this important NRC initiative. As a 10 CFR Part 50 licensee, CEI has a vested interest in any policies the Commission may adopt that have the potential to affect the management and operation of commercial nuclear power plants. Furthermore, we share with the industry and NRC the common objective that the results of the Regulatory Impact Survey be used to develop an action plan that results in real improvements in the regulatory process.

As discussed in the extensive comments submitted by NUMARC, it appears that the actions proposed by SECY-90-347 fall short of addressing some of the more significant issues identified by the survey. CEI fully supports the comments submitted by NUMARC on this document.

In particular, two key issues identified by NUMARC which deserve additional attention are: (1) NRC's increasing tendency to get involved in licensee management and performance issues, and (2) the NRC's shift in focus to managing/implementing the large number of NRC requirements rather than re-examining how the burden was created, i.e., have the additional requirements been appropriately justified?

Again, we appreciate the opportunity to provide an input on this important document and encourage the NRC to continue a dialogue with NUMARC on these issues.

Sincerely,

 Michael D. Lyster

MDL:RAN:njc

cc: B. Lee Jr. NUMARC
 NRC Project Manager
 NRC Resident Office

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