①

Rt#1, Pleasant Valley
Stoddard, WI 54658

November 19, 1982

Secretary
U.S. Nuclear Regulatory Commission
Washington, D. C.   20555

ATTN: Docketing and Service Branch

SUBJECT: Comments on Proposed Amendment to 10 CFR Part 50 as Published
              in the Federal Register on October 25, 1982

Gentlemen:

The proposed rule change would require licensees to compare and evaluate
their facility against the so-called Standard Review Plan acceptance criteria
and justify any deviations therefrom: I am totally opposed to this proposed
rule.

The Standard Review Plan is not Commission regulation, merely guidance.
Attempts to modify the Standard Review Plan through individual requests for
rule making to make it consistent throughout have met with the response from
the NRC legal staff that this is not a rule and therefore, there is no
particular mechanism to docket changes to the Standard Review Plan by
individuals. The Standard Review Plan is not an adequate document. It uses
different probabilities for the frequencies of outside events, including very
unrealistic ones on wind damage at 10^{-7} frequency. Because of the condition
of the current Standard Review Plan, no regulation should be established
requiring any licenseee who is requesting a facility license to compare their
plan to the Standard Review Plan. If the Standard Review Plan is moved into
a forum where individuals who are expert in this industry are in a position
to have adequate input put into it such a consideration might be reviewed in
the future. But, at this time, this is a very bad proposed rule and will
result in a great waste of resources and will definitely result in a deviation
of personnel away from truly safety-related reviews.

Sincerely,
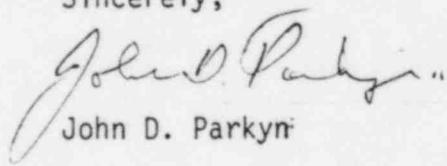
John D. Parkyn

John D. Parkyn

JDP:eme

DS10
add: Robert Purple
528 Phil

Acknowledged by card. 11/30/82 emp