Pacific Gas and Electric Company

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January 26, 1994

PG&E Letter No. DCL-94-021

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-80

Docket No. 50-323, OL-DPR-82 Diablo Canyon Units 1 and 2

Comments on Proposed Rulemaking for Commercial Grade Item

Dedication Facilitation (58 FR 53159)

Gentlemen:

In 58 FR 53159, the NRC published for public comment a Nuclear Management and Resources Council (NUMARC) petition for rulemaking to revise the definition of the term "commercial grade item (CGI)," to include a flexible generic process for dedication of CGIs for safety-related use. The petition also clarified that the entity performing the dedication of a CGI is responsible for discovering, evaluating, and reporting deficiencies as required by the NRC's regulations.

PG&E would like to comment that we support the changes proposed by NUMARC and urge their adoption. For the reasons noted in the petition for rulemaking, these changes would be of considerable benefit to the industry's procurement process.

Sincerely,

Gregory M. Rueger

cc: Mary H. Miller

Kenneth E. Perkins Sheri R. Peterson Diablo Distribution

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