

DOCUMENT NUMBER

PETITION/RULE PRM 50-60

(59FR 17499)

DOCKETING

5



GPU Nuclear Corporation
One Upper Pond Road
Parsippany, New Jersey 07054
201-316-7000
TELEX 136-482
Writer's Direct Dial Number:

'94 JUN 20 P2 21

OFFICE OF THE SECRETARY
DOCKETING AND SERVICES BRANCH

June 16, 1994
C300-94-2161

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

Attention: Docketing and Services Branch

Subject: Virginia Power; Filing of Petition for Rulemaking
59 Federal Register 17499, April 13, 1994
Request for Comments

These comments reflect the position of GPU Nuclear Corporation. GPU Nuclear has reviewed Virginia Power's petition to amend emergency preparedness program review activities 10 CFR 50.54(t) (59 Fed. Reg. 17499, April 13, 1994). The proposed petition amends the emergency preparedness requirements to conduct independent reviews of its emergency preparedness program from annual to a nominal 24-month periodicity.

GPU Nuclear supports the petition for rulemaking associated with 10 CFR 50.54(t) because it reflects an improvement in the current regulatory framework and is warranted by licensee performance. GPU Nuclear believes, however, that the actual audit frequencies implemented should be based on performance in the subject area with the licensee's commitment reflecting the maximum interval between audits.

Any audit program is established to ensure that plans, procedures and instructions are sufficient and effectively implemented. In addition, audits verify compliance with Regulations, Operating License and Technical Specification requirements and other regulatory requirements and commitments. The effectiveness of such a program is not contingent upon a particular schedule but rather the thoroughness and scope of the audits and the comprehensiveness of the follow up to findings and recommendations. The proposed change concerns only the audit schedule.

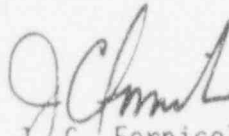
9406220130 940616
PDR PRM PDR
50-60

DS10

In the area of emergency preparedness, there are scheduled activities which are active indicators of satisfactory or degrading performance capabilities. Feedback from actual events, the biennial exercise, on and off-site drills and coordination, and communication and facility checks provide sufficient bases to assess performance when compared to predetermined, licensee established criteria. These drills, exercises and regular operational activities also test the adequacy of the interface between the licensee and Federal, State and local government organizations. As with the current audit program, unsatisfactory performance would be handled through the licensee's corrective action program to resolve the issue and assure satisfactory future performance.

Should you require additional information regarding GPU Nuclear's position on this petition for rulemaking, please contact me.

Sincerely,



J. C. Fornicola
Licensing & Regulatory Affairs Director

/plp

cc: A. P. Heymer, NEI