

DOCKET NUMBER  
PETITION RULE PRM 73-9  
(56 FR 3228)

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91 MAR -1 P5 97 FEB 29 P4 14

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BRANCH  
February 27, 1991  
C300-91-2043  
C320-91-2065

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

Attention: Docketing and Service Branch

RE: Nuclear Control Institute and the Committee to Bridge the Gap:  
Petition for Rulemaking - Upgrading the Design Basis Threat for  
Radiological Sabotage of Nuclear Reactors  
(56 Fed. Reg. 3228 - January 29, 1991)  
Request for Comments

Dear Mr. Chilk:

General Public Utilities Nuclear Corporation (GPUN) wishes to provide the following comments on the subject petition for rulemaking. Firstly and foremost GPUN supports the comments being submitted to you by the Nuclear Management and Resources Council, Inc. (NUMARC). GPUN also wishes to emphasize that our security personnel and management have established contact with our Local Law Enforcement Agencies (LLEA). We continue to maintain close ties with LLEA in order to remain vigilant in our efforts to have the best available information on any potential threat to the security of our nuclear facilities. Additionally, we believe that the existing design basis threat established in the regulations is currently adequate for protection against radiological sabotage of nuclear reactors (see 10 CFR 73.55a). Therefore, GPUN recommends that NRC deny the petition.

Sincerely yours,

J. Knubel  
Director, Licensing & Regulatory Affairs

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JK/GG/cb

cc: Administrator, Region I  
Oyst Creek NRC Project Manager  
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