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License Number NPF-3

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February 28, 1991

Mr. Samuel J. Chilk  
Secretary of the Commission  
United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, D. C. 20555  
Attention: Docketing and Service Branch

Subject: Comments for Notice of Proposed Rulemaking - Upgrading the Design Basis Threat for Radiological Sabotage of Nuclear Reactors (56FR3228 - January 29, 1991).

Dear Mr. Chilk:

These comments are submitted by Toledo Edison in response to the petition for rulemaking relating to "Upgrading the Design Basis Threat for Radiological Sabotage of Nuclear Reactors" (56FR3228 - January 29, 1991).

Toledo Edison's comments are reflected in those which are being submitted on the industry's behalf by the Nuclear Management and Resources Council (NUMARC). The conclusion reached by NUMARC and concurred with by Toledo Edison is that the current level physical protection minimizes the likelihood and consequences of such an event. Therefore, the NRC should deny the petitioner's request.

If you have any questions concerning this matter, please contact Mr. R. W. Schrauder, Manager - Nuclear Licensing, at (419) 249-2366.

Sincerely yours,

GAB/eld

cc: P. M. Byron, DB-1 NRC Senior Resident Inspector  
A. B. Davis, Regional Administrator, NRC Region III  
D. C. Di Ianni, DB-1 NRC Senior Project Manager  
Utility Radiological Safety Board

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