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1/29/91
56FR 3289
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March 29, 1991

91 APR -9 AM 10:02

DATE FEB USNRC
REGULATORY PUBLICATIONS BR

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Chief, Regulatory Publications Branch

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Comments on NUREG/CR 2601, Addendum 1 Technology, Safety and Costs of Decommissioning

Gentlemen:

Baltimore Gas and Electric Company wishes to provide comments concerning the methodology used in the report for calculating new insurance requirements based on inflation. Specifically, our concern lies with the inclusion of insurance premiums and regulatory fees when determining the insurance coverage requirements. While insurance premiums and regulatory fees are a valid part of estimated costs, they are not insurable under our nuclear insurance policies and should be excluded when determining the minimum amount of property insurance required by the Nuclear Regulatory Commission.

Should you have any further questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,

GCC/PSF/psf/bjd

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