

NUMBER  
PETITION RULE PRM 9-2  
(59FR30308)

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USNRC

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August 30, 1994

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VIRGINIA POWER

Secretary to the Commission  
U.S. Nuclear Regulatory Commission  
Attention: Docketing and Service Branch  
Washington, D.C. 20555

Serial No. GL 94-020  
NL&P/GSS RO

Dear Sir:

**COMMENTS ON PETITION FOR RULEMAKING**  
**OHIO CITIZENS FOR RESPONSIBLE ENERGY, INC.**  
**10 CFR PART 9**

In the June 13, 1994 Federal Register, the NRC requested comments on the petition for rulemaking filed with the Commission by the Ohio Citizens for Responsible Energy, Inc. (OCRE). The petition requests the Commission to amend its regulations to establish public right-to-know provisions that would ensure public access to licensee-held information.

We do not support the petition for rulemaking but rather endorse NEI's comments, which have been separately submitted, regarding the merits of the petition. In addition to the NEI comments in response to OCRE's contention of a trend towards "decreasing the amount of information to which the public has access," we note that reconsideration of reporting requirements is also part of a NRC effort to direct licensee resources and priorities away from activities marginal to safety and apply them to safety significant activities. The OCRE petition is contrary to this policy as it would re-emphasize activities which were de-emphasized as marginal to safety. Furthermore, we believe that administration of the proposed program would be of significant cost and a resource burden.

We appreciate the opportunity to make comments on the petition for rulemaking. If you have any questions, please contact us.

Very truly yours,

M. L. Bowling, Manager  
Nuclear Licensing and Programs

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