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DOCKET NUMBER
PROPOSED RULE **PR 50**
(59FR52707)

December 30, 1994

Office of the Secretary of the Commission
Attn: Docketing and Service Branch
U S Nuclear Regulatory Commission
Washington, DC 20555

MONTICELLO NUCLEAR GENERATING PLANT
PRAIRIE ISLAND NUCLEAR GENERATING PLANT

Comments on Proposed Rule: Shutdown and
Low-Power Operations for Nuclear Power Reactors

Northern States Power Company has reviewed the proposed changes to 10 CFR Part 50, Section 50.67 "Shutdown and low-power operations", and would like to offer the following comments.

First, we have evaluated the impact of the rule on the operation of our plants and believe that the impact is significantly higher than that described in the regulatory analysis. Specifically, the rule will extend the refueling outages at all three of our units by 7 to 9 days (increasing replacement energy costs) and increase operations and maintenance expenses because of containment related restrictions. Additionally, this will result in increased personnel exposure.

Second, we have reviewed the comments to be submitted by the Nuclear Energy Institute (NEI) on this subject and endorse, in their entirety, their content.

We believe that the interest in reducing shutdown risks is commendable but that not enough credit is being given for the improvements which the industry is achieving outside the constraints of prescriptive regulations. Considering the significant cost increases that would be placed on licensees by the rule as currently proposed, not enough attention has been given to the possibility that those recent industry improvements have significantly reduced the benefits available from implementation of the proposed rule.

Roger O Anderson for ROA
Roger O Anderson
Director
Licensing and Management Issues

c: (see next page)

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NORTHERN STATES POWER COMPANY

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