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November 28, 1995  
OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

C. Lance Terry  
Group Vice President, Nuclear

Mr. John Hoyie  
Secretary, U. S. Nuclear Regulatory Commission  
Attn: Docketing and Service Branch  
Washington, DC 20555-0001

DOCKET NUMBER  
PETITION RULE PRM 50-62  
(60FR47716) (12)

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
REQUEST FOR PUBLIC COMMENT ON NUCLEAR ENERGY  
INSTITUTE (NEI) 10 CFR 50.54(a) PETITION

- REF: 1) Federal Register, Volume 60 - 47716 dated  
September 14, 1995
- 2) Nuclear Energy Institute (NEI) letter from  
Mr. Thomas A. Tipton dated November 28, 1995  
to Secretary, Nuclear Regulatory Commission  
in response to 60 FR 47716

Gentlemen:

Per reference 1, Nuclear Regulatory Commission (NRC) requested public comment on the subject rulemaking petition filed by NEI. The petition requests NRC to amend its regulation regarding quality assurance (QA) programs to permit nuclear power plant licensees to change the quality program referred/described in the Safety Analysis Report (SAR) without prior NRC approval if an evaluation determines that the changes do not present a potential to degrade safety or do not result in a change to the plant Technical Specifications (TS).

Reference 2 provided the NEI response to the NRC addressing the specific eight NRC issues in the federal register notice. Based on TU Electric's review of the proposed amendment to 10 CFR 50.54(a) contained in the NEI petition, we find the proposed wording and changes to be appropriate and responsive to licensee needs.

Regulatory acceptance of the proposed changes in the subject petition would improve the consistency in QA program changes submitted for NRC approval, by eliminating the ambiguity in the existing wording of 10 CFR 50.54(a). It should be noted that words such as "decrease in QA program effectiveness" are also vague and open to interpretation and offer little or no real relief to a licensee. The proposed changes in the subject petition utilize a recognized NRC process (10 CFR 50.59) to evaluate changes to QA programs for impact on safety, which was the intended purpose of the initial rulemaking in 1983. The proposed changes satisfy the original intent of the regulation and eliminate differences

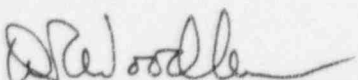
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in opinion between licensees and the NRC Staff. These changes would encourage licensees to focus on ways to further improve their quality programs without the resource uncertainties of the current change process and also enable licensees to focus attention/resources to safety significant matters, enhancing public health and safety.

Sincerely,

C. L. Terry

By:   
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D. R. Woodlan  
Docket Licensing Manager

JMK/jmk

c - Mr. T. E. Tipton, NEI