Southern Nuclear Operating Company Post Office Box 1295 Birmingham, Alabama 35201 Telephone (205) 868-5131



Dave Morey Vice President Farley Project

Southern Nuclear Operating Company

the southern electric system

December 8, 1995

Docket Nos.

50-348

50-364

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D. C. 20555

Comments on

"Proposed Generic Communication; Licensee Qualification for Performing Safety Analyses"

(60 Federal Register 54712 dated October 25, 1995)

Dear Sir:

Southern Nuclear Operating Company (Southern Nuclear) has reviewed the proposed Supplement 1 to Generic Letter 83-11, "Licensee Qualification for Performing Safety Analyses," published in the Federal Register on October 25, 1995. In accordance with request for comments, Southern Nuclear is in total agreement with the NEI comments which are to be provided to the NRC. In particular, Southern Nuclear supports the concept of eliminating the need for detailed licensee qualification topical reports to demonstrate their ability to perform safety analyses using NRC-approved methods and codes. This process is resource intensive and unnecessary as well as redundant. Adoption of the alternative guidelines in the proposed supplement will reduce this burden to the licensees as well as the Staff which would allow more time to concentrate on issues of significant safety value. Additionally, GE Nuclear Energy and Westinghouse are providing comments on this document which we believe to be appropriate and beneficial.

Should you have any questions, please advise.

Respectfully submitted,

On mory

Dave Morey

DNM/JDB

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U. S. Nuclear Regulatory Commission

Southern Nuclear Operating Company cc:

R. D. Hill, Plant Manager

U. S. Nuclear Regulatory Commission, Washington, DC B. L. Siegel, Licensing Project Manager, NRR

U. S. Nuclear Regulatory Commission, Region II

S. D. Ebneter, Regional Administrator

T. M. Ross, Senior Resident Inspector