

Pilgrim Nuclear Power Station Rocky Hill Road Plymouth, Massachusetts 02360 DOCKETED USNRC

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December 14, 1995 BECo Ltr. #95425

PROPOSED RULE PR 60, 78, 78+75

Docket No. 50-293 License No. DPR-35

E. T. Boulette, PhD Senior Vice President - Nuclear

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555

## Proposed Rule - Safeguards for Spent Nuclear Fuel 60FR42079

Although Pilgrim Nuclear Power Station is not currently an Independent Spent Fuel Storage Installation (ISFSI) or Monitored Retrievable Storage (MRS) facility, Boston Edison Company endorses the comments submitted by the Nuclear Energy Institute dated November 13, 1995, regarding the proposed rule on Safeguards for Spent Nuclear Fuel or High Level Radioactive Waste. The proposed regulations are not commensurate with any potential threat to the public health and safety; therefore, applying protected area design basis threat and Part 73 safeguards criteria to an ISFSI would result in an excessive level of protection. We, therefore, concur with the NEI proposal to equate the regulatory burden commensurate with the safety significance.

E. T. Boulette, PhD

## MTL/Rap95/Prfuel

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