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USNRC OFFICE OF ADMINISTRATION

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Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483 92 JUL 28 A10:24 '92 JUL 29 A11:45

The Light

company

July:22, 1992 ST-HL-AE-4162 File No.: G25

PLICE

Regulatory publications Branch DFIPS Office of Administration U.S. Nuclear Regulatory Commission Washington, DC 20555

> Comments on Proposed Rules, 10CFR Parts 20 and 50 "Reducing the Regulatory Burden on Nuclear Licenses"

HL&P has reviewed Proposed Rules, 10CFR Parts 20 and 50, "Reducing the Regulatory Burden on Nuclear Licenses," and offers the following comments:

 Item 5, Frequency of Radiological Effluent Reports (10CFR 50.360):

This 10CFR change will be acceptable, but our License, Technical Specification (TS) 6.9 section, will still require semi-annual reports. In essence, this does not help unless NRC promptly allows changes to Technical Specifications.

2. Item 1, Frequency of Final Safety Analysis Report Updates (10CFR50.71) and Item 2, Annual Design Change Reports (10CFR50.59): The proposed rule should be clarified with regard to how it would apply to a two unit site with a common UFSAR. We would recommend that the rule simply require an update once each 24 months and be current as of the preceding 6 months.

If there are any questions concerning this matter, please contact me at (512) 972-7205.

William J. Jump General Manager, Nuclear Licensing

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