DOCKETED

EDISON ELECTRIC INSTITUTE The association of electric on paper 10 P3:43 (49 F 1111 19th Street, N.W.

Washington, D.C. 20036

Tel: (202) 828-7400

OFFICE OF SECRETA TO DOCKETING & SERVICE BRANCH

December 7, 1984

Mr. Samuel J. Chilk Secretary Office of the Secretary of the Commission U.S. Nuclear Regulatory Commission 1717 H Street, N.W. Suite 1121 Washington, D.C. 20555

RE: Changes in Property Insurance Requirements for NRC Licensed Nuclear Power Plants, 49 Fed. Reg. 44645

Dear Mr. Chilk:

The Edison Electric Institute (EEI) hereby requests an extension of time of thirty days, until February 6, 1985, in which to comment in this proceeding. EEI is the national association of the investor-owned electric utility industry. EEI had filed comments addressing the Long Report and responding to the Advanced Notice of Proposed Rulemaking issued on June 24, 1982 which discussed the subject matter of this proposed rule.

EEI believes that additional time is necessary in order to fully determine the position of our member companies with respect to matters for which the Commission seeks specific comments. Because of the potential impact of the issues involved, it is necessary to obtain input from member company personnel with expertise in a wide variety of different fields. The fact that the comment period extends over the holiday season makes it more difficult to conduct the necessary coordination within the current comment period. An extension of time of thirty days will help alleviate these difficulties.

EEI appreciates your expeditious response to this request.

8412180598 841207 PDR PR 50-49FR44645 PDR Sincerely yours,

Kearney

JJK:ehp

cc: Messrs. Edward H. Comer T. I. Gradin

Robert S. Wood

DS 10 add Roset 5 Wood, AR-5037 10