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Pacific Gas and Electric Company

77 Beale Street
San Francisco, CA 94106
415/973-4681

Gregory M. Rueger
Senior Vice President
General Manager
Nuclear Power Generation

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Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Comments Regarding Extending the Proposed 10 CFR 20 Revision
Implementation Date to January 1, 1994

Gentlemen:

Pacific Gas and Electric Company (PG&E) has reviewed and supports the NRC's proposal to change the implementation date to January 1, 1994 of the revised 10 CFR 20, Standards for Protection Against Radiation. Allowing an additional year for implementation will give PG&E, and other nuclear utilities, the necessary time to assure that the transition from the present rules to the new rules is made in an orderly and effective manner. It will provide adequate time for licensees to examine the new and revised regulatory guides that are still being developed to clarify key concepts of the revised Part 20 and to develop or revise their regulation compliance capability based on this guidance.

Sincerely,

Gregory M. Rueger

cc: John B. Martin
Harry Rood
John Schmitt, NUMARC
Diablo Distribution

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