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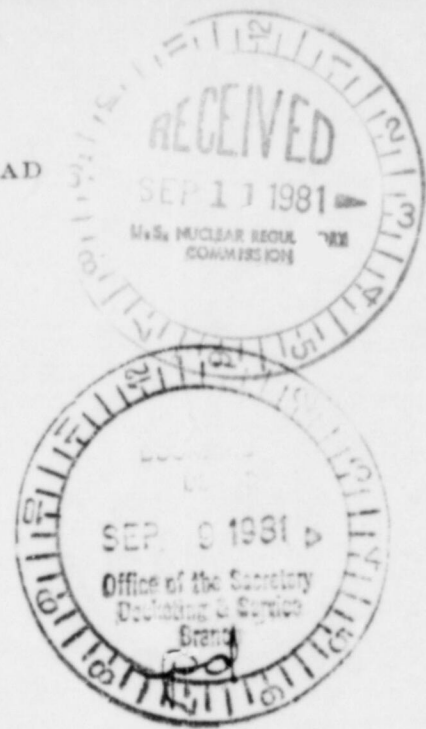
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September 9, 1981

PROPOSED RULE PR-50 (11)  
(46 FR 34595)



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

Attn: Docketing and Service Branch

Dear Sirs:

This letter is submitted on behalf of Boston Edison Company, Florida Power and Light Company, Iowa Electric Company and Puget Sound Power and Light Company, in response to the notice of proposed rulemaking entitled: "Reporting of Changes to the Quality Assurance Program," which was published by the NRC in the Federal Register on July 2, 1981 (46 Fed. Reg. 34,595).

We have no comment with respect to proposed subparagraphs (1), (2) and (3) of the proposed new paragraph 50.54(a) other than to clarify the relationship between proposed subparagraph (a)(3) and existing § 50.59 ("Changes, tests and experiments"). It should be made clear in the proposed new § 50.54(a) or in § 50.59, or in both, that changes subject to the provisions of § 50.54(a) are not subject to the change procedures specified in § 50.59.

We believe that proposed subparagraph (4) will require unnecessary duplication of reports. The reports which will be required by the proposed subparagraph 50.54(a)(4) would duplicate the reporting provisions in § 50.71(e). That provision of § 50.71 requires each person licensed to operate a power reactor to update the relevant FSAR at least annually and furnish the revisions to the NRC. No justification is included in the statement of considerations published with the

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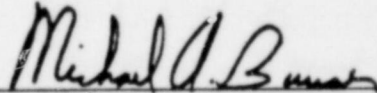
Secretary of the Commission  
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notice of proposed rulemaking which would justify the duplication or a need for a 30-day report. The Commission staff can readily duplicate and circulate to the appropriate staff those changes in quality assurance programs which are reported pursuant to § 50.71.

We have no comment with respect to proposed new subsection (f) in § 50.55.

We appreciate the opportunity to furnish these comments.

Respectfully submitted,



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