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DS09  
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July 7, 1997

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HL-5424  
LCV-1065

Chief, Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555-0001

Comments on NUREG-1606  
Proposed Regulatory Guidance Related to Implementation of  
10 CFR 50.59 (Changes, Tests or Experiments)  
(62 Federal Register 24997 dated May 7, 1997)

Dear Sir:

Southern Nuclear Operating Company (Southern Nuclear) has reviewed the Nuclear Regulatory Commission's (NRC's) proposed regulatory guidance related to implementation of 10 CFR 50.59 contained in NUREG-1606 which was published in the Federal Register on May 7, 1997. In accordance with request for comments, Southern Nuclear endorses comments of the Nuclear Energy Institute (NEI). NEI's comments accurately convey Southern Nuclear's position on the referenced NRC proposal.

Southern Nuclear would like to emphasize that the proposed guidance contained in NUREG-1606 will create a resource burden for both industry and the NRC. The proposed guidance will lower the screening threshold and require industry to perform additional 10 CFR 50.59 safety evaluations in order to make unreviewed safety question determinations on matters of little or no safety significance. Also, by using the interpretations contained in the proposed guidance, a significant increase in the number of determinations of unreviewed safety questions (and potential plant downtime) will result, which will require NRC review and approval. Unfortunately, industry and NRC focus will be on operational compliance with an increase in cost without a discernible improvement in plant safety.

The NRC has already gone on record recognizing the improvement in quality of 10 CFR 50.59 evaluations since the adoption of NSAC-125 by the industry, and that changes of significance are highly likely to be identified by licensees through implementation of the guidance contained in NSAC-125. The industry is currently in the process of updating the guidelines contained in NSAC-125 via NEI 96-07. With the changes that will be incorporated into NEI 96-07, Southern Nuclear believes that NRC concerns with 10 CFR 50.59 will be adequately addressed and should be given serious consideration as an alternative to NUREG-1606.

ISIP-11 Guides & Manuals

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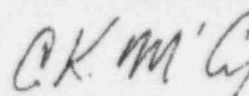
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In conclusion, Southern Nuclear acknowledges NRC's concerns with the implementation of 10 CFR 50.59 at selected plants. However, those concerns should not be viewed as indicative of the industry as a whole. In the past, most plants have implemented 10 CFR 50.59 in a comprehensive and conscientious manner. Therefore, the NRC is encouraged not to abandon some thirty years of effective implementation of 10 CFR 50.59 for new positions that will contribute little if any to plant safety.

Should you have any questions, please advise.

Respectfully submitted,

  
C. K. McCoy

CKM/TMM

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HL-5407  
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Number of pages including cover sheet 3

REMARKS

Urgent

Reply ASAP

For your review

Please comment