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62FR 24997
May 7, 1997
(42)

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July 8, 1997

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RECEIVED
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RULES & DIR. BRANCH
US NRC

Subject: Beaver Valley Power Station, Unit No. 1 and No. 2
BV-1 Docket No. 50-334, License No. DPR-66
BV-2 Docket No. 50-412, License No. NPF-73
Proposed Regulatory Guidance
Implementation of 10 CFR 50.59

Duquesne Light Company (DLC), operating company for Beaver Valley Units 1 and 2, is providing comments on the subject regulatory guidance announced in the Federal Register May 7, 1997 at page 24997. We have supported the efforts of the Nuclear Energy Institute (NEI) to consolidate industry comments which have been submitted to you under NEI letterhead on July 7, 1997, and endorse the NEI submittal.

Within the NEI submittal, Enclosure 2 of their July 7 letter, are practical examples which will be integral to achieving a mutually understood and workable safety evaluation process. Please consider addressing the NEI examples in some detail to avoid a counter-productive increase in NRC submittals that do not significantly relate to public safety. Your specific interpretation and guidance on these examples are essential to avoiding this consequence.

DLC recommends that the NRC continue to work with the industry, through the Nuclear Energy Institute (NEI), to further clarify applications of the subject guidance.

Sincerely,

Sushil C. Jain

Sushil C. Jain

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c: Mr. D. M. Kern, Sr. Resident Inspector
Mr. H. J. Miller, NRC Region I Administrator
Mr. D. S. Brinkman, Sr. Project Manager
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