

DOCKET NUMBER PR 50
PROPOSED RULE
(53 FR 16435)

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KMC, Inc.
801 18TH STREET, N.E.
SUITE 302
WASHINGTON, D.C. 20002
(202) 293-4200

June 23, 1988

Secretary
U.S. Nuclear Regulatory Commission
ATTN: Docketing and Service Branch
Washington, D.C. 20555

SUBJECT: Proposed Rule on Emergency Planning and Preparedness
Requirements for Nuclear Power Plant Fuel Loading and
Initial Low-Power Operations 53 Federal Register 16435.

Dear Sir:

KMC, Inc. on behalf of the Coordinating Group on Emergency Preparedness Implementation is pleased to offer comments supportive of the proposed rule. The members of the group are listed in Enclosure A. All of the utility members as listed in the enclosure currently own operating nuclear power plants and although only one utility has a plant which will be impacted by the rule at the present time, members strongly believe the rule change should be approved to clarify the intention and purpose of off-site planning as it relates to fuel loading and operation up to 5% of full power.

The CGEP has been actively participating in emergency planning issues since it was organized over 8 years ago. The group has provided extensive comment to the NRC and FEMA on many proposed rules, policy statements, procedures, and NUREG Documents, which relate to emergency planning. The group has consistently supported well reasoned requirements that would improve emergency planning implementation; but, has questioned features which were believed to be of questionable value. With regard to the issue now motivating the proposed rule change, we have at numerous times voiced objections to the requirement for early notification of all

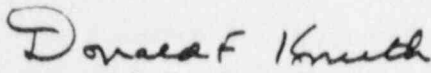
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persons within the 10 mile EPZ at all sites as a general requirement. This requirement as applied for obtaining a low power license is without merit, and although the current regulation could be interpreted as not requiring it, we strongly endorse the proposed rule change which would include explicit language to remove all doubt.

We would be pleased to discuss our views with your staff.

Sincerely,


Donald F. Knuth
President

Encl.

ENCLOSURE A

COORDINATING GROUP ON EMERGENCY PREPAREDNESS
IMPLEMENTATION

Baltimore Gas & Electric Co.
Consolidated Edison Co. of N.Y.
Edison Electric Institute
GPU Service Corporation
Long Island Lighting Co.
Nebraska Public Power District
Northeast Utilities
Northern States Power Co.
Omaha Public Power District
Pacific Gas & Electric Co.
Pennsylvania Power & Light Co.
Public Service Electric & Gas Co.
Sacramento Municipal Utility District
Southern California Edison Co.
Yankee Atomic Electric Co.