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

ATTENTION: Docketing and Service Branch

SUBJECT: 53 Federal Register 21981 (June 13, 1988)
Comments on NRC Policy Statement
10CFR50: Cooperation With States at Commercial
Nuclear Power Plants or Utilization Facilities

Dear Sir or Madam:

Louisiana Power & Light Company (LP&L), owner and operator of Waterford Steam Electric Station - Unit Number 3, a nuclear generating station located in Taft, Louisiana, is providing comments on the subject Federal Register notice. LP&L supports the policy statement and agrees with the rationale used by the Nuclear Regulatory Commission (NRC) in developing the statement as presented in the Federal Register notice.

As the NRC indicates in the policy statement:

It is the NRC's policy to cooperate fully with State governments as they seek to respond to the expectations of their citizens that their health and safety be protected and that there be minimal impact on the environment as a result of activities licensed by the NRC. The NRC and the States have complementary responsibilities in protecting public health and safety and the environment.

Inasmuch as LP&L employees are citizens of the State of Louisiana, LP&L respects, understands and supports these states' rights and desires. However, states are already burdened with many pressing fiscal responsibilities. Nuclear power technology and regulation thereof require a great deal of expertise that both the industry and the NRC have established over a long period of time. The NRC has in place the technological expertise to assess its licensees/applicants without regard to geographical location. For these reasons, states' desires for increased interaction in matters of nuclear

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power are better served by continued, albeit increased, interaction with the NRC, rather than through direct, independent action with NRC licensees/applicants.

LP&L concurs with the NRC's stated concern that:

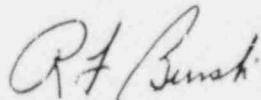
...independent State inspection programs could direct an applicant's or licensee's attention to areas not consistent with NRC safety priorities, misinterpret NRC safety requirements, or give the perception of dual regulation.

LP&L finds the elements required to be identified in a state's proposal for an instrument of cooperation to be reasonable and appropriate. Further, LP&L strongly concurs that all enforcement action should be undertaken by the NRC.

LP&L encourages the NRC to include one further consideration in the policy statement: that of apprising potentially affected licensees/applicants that their state is pursuing an instrument of cooperation with the NRC. This would allow licensees/applicants to be a party to the proceedings through the public participation process, in the same manner that petitions brought by licensees/applicants to the NRC are open to public participation.

LP&L appreciates this opportunity to comment on the subject policy statement.

Yours very truly,



R.F. Burski
Manager
Nuclear Safety & Regulatory Affairs

RFB/CDG/plm

cc: J.G. Dewease, R.P. Barkhurst, N.S. Carns, M.J. Meisner, J.J. Cordaro,
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