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1998 SEP 21 PM 1:46

RULES & DIR. BRANCH  
US NRC

BFR 38865  
July 20, 1998

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A. Ronseni

September 15, 1998

Docket Nos.	50-348	50-321	50-424	HL-5682
	50-364	50-366	50-425	LCV-1250

Mr. David L. Meyer, Chief  
Rules Review and Directives Branch  
Mail Stop T-6 D69  
Office of Administration  
United States Nuclear Regulatory Commission  
Washington, D. C. 20555-0001

Comments on Draft Nureg-1633, "Assessment of the Use of Potassium Iodide (KI) As a Protective Action During Severe Reactor Accidents,"  
(63 Fed. Reg. 38865, July 20, 1998)

Dear Sir:

Southern Nuclear Operating Company (Southern Nuclear) has reviewed NRC's Draft Nureg-1633, notice of which was published in the Federal Register on July 20, 1998. The Draft Nureg provides a synopsis of the historical use, the technical basis and industry experiences with KI as a supplemental protective action for the general public living in the area around a commercial nuclear power plant. In accordance with the request for comments, Southern Nuclear endorses comments submitted by the Nuclear Energy Institute (NEI) which accurately convey Southern Nuclear's position on the referenced NRC Draft Nureg-1633.

Southern Nuclear would like to emphasize that though KI stockpile and distribution are common practice in the European countries, consequences of the Chernobyl experience should not provide adequate grounds for changing the current U. S. policy. The Federal Radiological Preparedness Coordinating Committee (FRPCC) policy statement discussed in COMSECY 97-028, asserts that evacuation, and under certain conditions shelter, constitute the primary protective actions for public protection. At the emergency classifications where protective actions are performed, KI would not add any significant level of safety and could actually hinder and complicate the emergency response effort.

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Should you have any questions, please advise.

Respectfully submitted,

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J. Barnie Beasley, Jr.

JBB, Jr./NMM

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U. S. Nuclear Regulatory Commission

cc: Southern Nuclear Operating Company  
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HL-5682  
LCV-1250