

CHARLES H. CRUSE  
Vice President  
Nuclear Energy

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RULES & DIR. BRANCH  
US NRC

Baltimore Gas and Electric Company  
Calvert Cliffs Nuclear Power Plant  
1650 Calvert Cliffs Parkway  
Poolesville, Maryland 20657  
410 495-4455

63 FR 38865  
July 20, 1998

19

September 22, 1998

U. S. Nuclear Regulatory Commission  
Washington, DC 20555

ATTENTION: Mr. David L Meyer, Chief  
Rules Review and Directives Branch

SUBJECT: Calvert Cliffs Nuclear Power Plant  
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318  
Request for Comments; Draft NUREG-1633, "Assessment of the Use of  
Potassium Iodide (KI) As a Protective Action During Severe Reactor Accidents"  
(63 FR 8865, July 20, 1998)

We have reviewed draft NUREG-1633, "Assessment of the Use of Potassium Iodide (KI) As a Protective Action During Severe Reactor Accidents," concerning the historical use, technical basis, and industry experiences with KI as a supplemental protective action for the general public.

We endorse the draft NUREG's conclusion that careful consideration should be given to whether the use of KI for the public during an emergency is advantageous. The draft NUREG accurately states that "considering" stockpiling or predistribution of KI as a protective action will not add any significant public health and safety benefit beyond the existing emergency planning practices at commercial nuclear power plants.

Baltimore Gas and Electric Company also agrees with the staff's assessment in SECY 98-061 "Staff Options for Resolving a Petition for Rulemaking Relating to Re-evaluation of the Policy Regarding the Use of Potassium Iodide (KI) by the General Public After a Severe Accident at a Nuclear Power Plant." We endorse Option 2. This option recommends denying the petition and supports Federal Radiological Preparedness Coordinating Committee policy statement discussed in draft "Federal Register Notice on Potassium Iodine Policy," COMSECY 97-028, which maintains that evacuation and sheltering are the primary protective actions. We strongly urge the NRC to reconsider its approval of the proposed rulemaking petition.

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PDR NUREG  
1633 C PDR

Mr. David L Meyer, Chief

September 22, 1998

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Should you have questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,



CHC/JMO/dlm

cc: Document Control Desk, NRC  
R. S. Fleishman, Esquire  
J. E. Silberg, Esquire  
S. S. Bajwa, NRC  
A. W. Dromerick, NRC

H. J. Miller, NRC  
Resident Inspector, NRC  
R. I. McLean, DNR  
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