Lewis Sumper Southern Muclear Vice President Operating Company, Inc. DOCKETED 40 Inverness Parkway Hatch Project Support USHRC Post Office Box 1295 Birmingham, Alabama 35201 Tel 205.992.7279 SEP 24 P1:02 '98 Fax 205.992.0341 SOUTHERN September 21, 1998 COMP Energy to Serve Your World AD.A Docket Nos. 50-348 50-321 HL-5683 50-424 50-425 LCV-1251 50-364 -50-366 DOCKET NUMBER Mr. John C. Hoyle, Secretary PROPOSED RULE U. S. Nuclear Regulatory Commission ATTN: Docketing and Service Branch 63FR 39522 Washington, D. C. 20555

Comments on NRC's Advanced Notice of Proposed Rulemaking, "Reporting Requirements for Nuclear Power Reactors" (63 Federal Register 39522 dated July 23, 1998)

Dear Sir:

Southern Nuclear Operating Company (Southern Nuclear) has reviewed NRC's advanced notice of proposed rulemaking "Reporting Requirements for Nuclear Power Reactors," published in the Federal Register on July 23, 1998. In accordance with request for commonts, Southern Nuclear Operating Company (Southern Nuclear) is in total agreement with the NEI comments which are to be provided to the NRC.

In addition, there are elements of the proposed rule that are contrary to the guidance in NUREG-1022, Revision 1. While rulemaking is in process, SNC requests that the NRC provide guidance to the application of NUREG-1022, Revision 1 in regard to these elements of the proposed rule (i.e., outside design basis).

Should you have any questions, please advise.

Respectfully submitted,

H. L. Sumner

HLS/JDB

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cc:

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U. S. Nuclear Regulatory Commission, Region II

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