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April 22, 1988
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Reference: Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

Subject: Proposed NRC Rule on Unannounced NRC Inspectors

Detroit Edison appreciates the opportunity to comment on the subject proposed rule published in the Federal Register on March 18, 1988. Detroit Edison believes that the proposed rule is unnecessary and will not serve the purpose envisioned by the NRC. It is important that Management at an operating nuclear power plant know at all times who is on site. The safety concerns associated with having an unannounced inspector inside the plant far outweigh the concerns regarding secrecy on which the proposed rule was based.

Detroit Edison also believes that the rule, as proposed, would be difficult if not impossible to administer. A literal interpretation of the rule would suggest that any person onsite would be prohibited from disclosing the knowledge that they have regarding an onsite inspector to anyone. As such, the person would be required to lie to anyone requesting this information based on the proposed rule. It is doubtful that such behavior was contemplated when the proposed rule was drafted.

Furthermore, the proposed rule cuts against the NRC's expressed guidance regarding accountability under its emergency planning rules. The NRC requires accountability within 30 minutes following a call for an assembly and accountability. Under the proposed secrecy rule, which might even require modifications to the security system and computers, the goal of the 30 minute accountability would be in jeopardy. Worse, personnel safety may be in jeopardy.

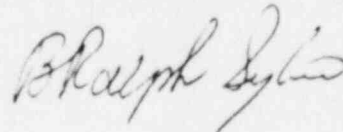
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In summary, Detroit Edison believes that the risks and uncertainties regarding this rule far outweigh any benefits which could be derived if it is implemented.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ralph Lytle".

cc: A. B. Davis
R. C. Knop
T. R. Quay
W. G. Rogers