

SUBJECT NUMBER
PROPOSED RULE

PR
50 57
(53FR36335)

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Wisconsin Power & Light Company

Investor-Owned Energy

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EXECUTIVE OFFICES

August 22, 1988

Mr. Samuel J. Chilk
Secretary
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: In the Matter of Proposed Rulemaking Regarding
Property Insurance For NRC-Licensed Power Plants
Docket No. PRM 50-_____

Dear Mr. Chilk:

On June 21, 1988, Edison Electric Institute (EEI) and Nuclear Utility Management and Resources Council (NUMARC) submitted a Petition for Rulemaking relative to property insurance for NRC-licensed power plants. Wisconsin Power and Light Company (WP&L) was not one of the petitioners; however, it is a co-owner of the Kewaunee Nuclear Power Plant in the Town of Carlton, an NRC-licensed plant, and therefore has an interest in this proceeding. WP&L has significant concerns as to the insurance requirements in the rule promulgated by NRC because it is at variance with the provisions of its mortgage indenture. Such variance creates problems which do not advance the interests sought to be advanced by NRC and are disruptive of WP&L's insurance program.

WP&L would urge NRC to accept the petition and to grant the relief requested.

Very truly yours,

Eugene O. Gehl
Executive Vice President
and General Counsel

EOG:jb

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