

Madison Gas and Electric Company
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DOCKET NUMBER 50 57
PROPOSED RULE (53FR 36335) (2)



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September 2, 1988

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

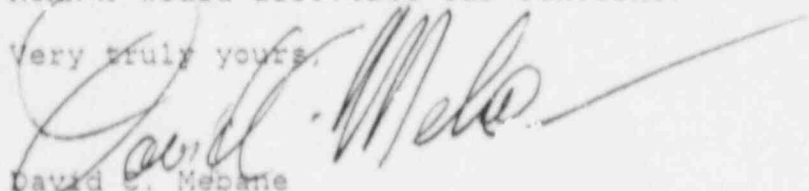
Dear Mr. Chilk:

Subject: In the Matter of Proposed Rulemaking Regarding
Property Insurance for NRC-Licensed Power Plants,
Docket No. PRM 50-

As one of the co-owners of the Kewaunee nuclear plant in the town of Carlton, Wisconsin, an NRC-licensed plant, Madison Gas and Electric Company urges the NRC to accept the petition submitted on June 21, 1988, by Edison Electric Institute (EEI) and Nuclear Utility Management and Resources Council (NUMARC) relative to property insurance for NRC-licensed power plants.

The subject rulemaking, as proposed by the NRC, causes our Company some concerns because the rule, as promulgated, is in conflict with the terms of our mortgage indenture and would cause us some significant problems with our Trustee. The relief outlined in the petition submitted by EEI and NUMARC would alleviate our concerns.

Very truly yours,


David C. Mebane
Senior Vice President
and General Counsel

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