



LOUISIANA
POWER & LIGHT

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July 9, 1986

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The Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATTENTION: Docketing and Service Branch

SUBJECT: Waterford 3 SES
Docket No. 50-382
Proposed Rule on Station Blackout,
Federal Register Notice, March 21, 1986

Dear Sir:

Louisiana Power & Light wishes to express our agreement with, and support for, the comments which the Nuclear Utility Management and Resource Committee (NUMARC) filed on the proposed rule on Station Blackout, June 17, 1986.

LP&L affirms NUMARC's view that the concerns related to Station Blackout are more appropriately addressed through industry initiatives to enhance AC power reliability and Station Blackout coping capability.

LP&L also believes that the need for the proposed rule has not been justified technically and also that the proposed rule does not meet the standards of the backfit rule. Application of the proposed rule would therefore result in the unnecessary expenditure of resources.

Over the past years, the industry has implemented significant modifications and operations that have enhanced AC power reliability and Station Blackout coping capability. These enhancements have been made on the basis of technical, economic and safety considerations. The NUMARC position is a viable and justifiable initiative and one that should provide an acceptable resolution of the Station Blackout issue.

Very truly yours,

G.W. Muench
Acting Director, Nuclear Operations

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GWM/RJM/smb

cc: B.W. Churchill, W.M. Stevenson, R.D. Martin, G.W. Knighton, J. Wilson,
NRC Resident Inspector's Office
NS41101

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