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Add: W. Butler

MARYLAND NUCLEAR
SAFETY COALITION

safe energy alternatives

DOCKETED USNRC
RULES & PROCEDURES BR
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Rules and Procedures Branch
Division of Rules and Records
Office of Administration
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sirs:

We wish to strongly oppose a request by Philadelphia Electric Company to amend license DPR 44 and DPR 56, excusing the utility from requiring their plant manager and superintendent of operations to obtain senior reactor operator licenses.

With Philadelphia Electric's long history of poor management of Peach Bottom, it would further undermine public confidence in the NRC if you would allow such a weakening of regulations. If anything, the NRC should require PE to comply to the letter of all regulations, and the NRC should spot-check compliance on an un-announced basis.

Further, we wish to register our concern that the present plan for the re-start of Peach Bottom (P.E.'s Commitment to Excellence plan) does not address the generic flaws of the reactor design, and in particular the deficient containment. The NRC must address all safety issues...technical as well as management-related problems.

Sincerely,

Patricia T. Birnie

Patricia T. Birnie
Co-Director

8709230296 870915
PDR ADOCK 05000277
R PDR

P.O. BOX 902/COLUMBIA, MD/21044
(301) 381-2714/433-4674

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letter sent 9/18/87

U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555



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