PROPOSED RULE PR 50

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Feb. 15, 1989

DUCKI BEAM Ft. Pierce. F1. 34982

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

Dear Sir:

I wish to make a comment on the proposed rule for Ensuring the Effectiveness of Maintenance Programs for Nuclear Power Plants.

I have fourteen years experience in the nuclear power industry, six years naval and eight years commercial.

I am very skeptical that this rule will have any positive impact on the commercial nuclear industry. The additional costs that this rule imposes, both logistical and material, will hamper nuclear power's return to becoming a competitive source of energy for our nation's future needs. The additional regulatory nightmare this creates will reinforce the industry's CEOs present opinion that nuclear power is more trouble than it is worth. Furthermore, how can the public feel any more assured that nuclear power is safe, when its governing agency proposes such a rule that implies the utilities are conducting business unsafely?

There is also the issue of fairness. Commercial nuclear power has arguably one the best industrial safety records. Yet, it is constantly being singled out by the press and government for non-existent safety problems. I realize the NRC has no control over other parts of industry, but what about the number of direct and indirect deaths caused by fossil fuel? What about the number of deaths caused by equipment malfunction or pilot error on airplanes? It is time the utilities are praised for their safety record, rather than forced to prove it again with this unfair burden.

Nuclear power is finally being recognized by more and more members of congress and the public as a necessary part of the solution to our nation's future energy needs. It is safe, economical, and relatively a non-pollutant when compared to other energy sources. Recent events, such as global warming and the nation's landfill crisis, has finally shed some light that nuclear power may achieve a comeback; but who would want to undertake such a venture as the construction of a new plant if a rule such a this is to be imposed upon them?

This proposed rule is unnecessary, and for the good of the industry, I implore you to reconsider.

Respectfully.

Relief F Girlin

Robert F. Czachor SOP 20289