



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

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September 29, 1999

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The Honorable Greta J. Discus
Chairman
U.S. Nuclear Regulatory Commission
Mail Stop O-16 C1
Washington, DC 20555-0001

DOCKET NUMBER
PROPOSED RULE **PR 50**
(64FR22580)

SUBJECT: 10 CFR 50.55a Supplemental Proposed Rule (64 Fed. Reg. 22580)

Dear Chairman Dicus:

The NRC should be complimented for the proposed rulemaking to eliminate the requirement for licensees to revise their inservice inspection (ISI) and testing (IST) programs beyond a baseline edition and addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code. Reconsideration of this requirement is warranted because there is no substantial increase in safety commensurate with the cost of implementation.

I understand that ASME, individuals from the industry, and NRC staff involved in ASME activities have communicated views opposing the proposed rule. Nevertheless, rulemaking consistent with the provisions of the backfitting rule and a demonstrated threshold of safety improvement represents sound regulatory policy.

In conclusion, I support the proposed rule to eliminate the 120-month update requirement in 10 CFR 50.55a, *Codes and Standards*.

Sincerely,

W. T. Cottle
President &
Chief Executive Officer

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- c: The Honorable Nils J. Diaz, Commissioner, NRC
- The Honorable, Edward McGaffigan Jr., Commissioner, NRC
- The Honorable Jeffrey S. Merrifield, Commissioner NRC
- Dr. William D. Travers, Executive Director for Operations, NRC

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