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OFFICE OF THE
RULEMAKING
ADJUDICATIONS STAFF

Secretary
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

DOCKET NUMBER
PROPOSED RULE **PR 21,50+54**
(64FR12117)

Attn.: Rulemakings and Adjudications Staff
Mail Stop O16C1

Subject: Proposed Rulemaking on *Use of Alternate Source Terms*
at Operating Reactors (64 Federal Register 12117,
March 11, 1999)

Duke Energy Corporation offers the following comments on the Proposed Rulemaking on *Use of Alternate Source Terms at Operating Reactors* (64 Federal Register 12117, March 11, 1999). Duke supports the proposed rule change. Duke agrees with and endorses the comments submitted on behalf of the industry by the Nuclear Energy Institute.

However, we have a specific concern about paragraph 50.67(b)(1). It is not clear whether a licensee will be allowed to use a revised source term on a limited basis (e.g., for analysis of a specific accident or function), or if they will be required to review the entire radiological consequence analyses to apply the new source term. Duke encourages the NRC to provide necessary guidance in Draft Guide DG-1081, *Alternative Radiological Source Terms for Evaluating the Radiological Consequences of Design Basis Accidents at Boiling and Pressurized Water Reactors*, to allow for limited use of the new source terms where such use can be justified.

Yours truly,

M. S. Tuckman

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