



Nuclear Management Company, LLC

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October 3, 2003

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PROPOSED RULE **PR 50**
(68FR 43673)

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USNRC

October 7, 2003 (3:10PM)

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attn: Rulemakings and Adjudications Staff

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

**COMMENTS ON NOTICE OF PROPOSED RULEMAKING FOR EMERGENCY
PLANNING AND PREPAREDNESS FOR PRODUCTION AND UTILIZATION
FACILITIES (68 FEDERAL REGISTER 43673, JULY 24, 2003)**

Nuclear Management Company (NMC), LLC* appreciates the opportunity to comment on the NRC's proposed rulemaking for emergency planning and preparedness for production and utilization facilities.

NMC shares the views expressed by the Nuclear Energy Institute (NEI) in their comments dated August 29, 2003. NMC supports the adoption of the Proposed Rule to amend 10 CFR 50 Appendix E.IV regarding NRC approval of licensee changes to Emergency Action Levels (EALs) and exercise requirements for co-located licensees. NMC believes these changes will reduce unnecessary regulatory burden while maintaining an acceptable level of safety.

NMC also concurs with NEI's suggestion that the proposed rulemaking would be strengthened by including additional language that clarifies the criteria that would constitute a "decrease in effectiveness".

Edward J. Weinkam
Director, Regulatory Services
Nuclear Management Company, LLC

* NMC is the licensed operator of the Duane Arnold Energy Center, Kewaunee Nuclear Power Plant, Monticello Nuclear Generating Plant, Palisades Nuclear Plant, Point

700 First Street • Hudson, Wisconsin 54016
Telephone: 715.377.3300

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Beach Nuclear Plant Units 1 and 2, and Prairie Island Nuclear Generating Plant Units 1 and 2.