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 AUTH. NAME: AUTH. AFFILIATION:
 MECREDY, R.C. Rochester Gas & Electric Corp.
 RECIP. NAME: RECIPIENT AFFILIATION
 CHILK, S.J. Office of the Secretary of the Commission

SUBJECT: Comment supporting proposed rule 10CFR51's renewal of
 nuclear plant OLS & NRC intent to prepare generic EIS.

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PROPOSED RULE (55FR29964)

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH October 24, 1990

Mr. Samuel J. Chilk
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch

RE: Advance Notice of Proposed Rulemaking - 10 C.F. R. Part 51
License Renewal for Nuclear Power Plants; Scope of
Environmental Effects
55 Fed. Reg. 141 (July 23, 1990)
Request for Comments

Dear Mr. Chilk:

Rochester Gas and Electric Corporation (RG&E) supports the comments submitted by the Nuclear Management and Resources Council, Inc. (NUMARC) in response to the Advanced Notice of Proposed Rulemaking entitled "License Renewal for Nuclear Power Plants; Scope of Environmental Effects". RG&E has been assisting NUMARC in gathering environmental information and evaluating methodologies for appropriate environmental assessment of license renewal.

The preparation of a generic environmental survey (GES) appears to be the most effective means of compiling data and assessing the potential for environmental impact due to the ongoing operation of nuclear plants. The nuclear industry and the Nuclear Regulatory Commission have done an excellent job of documenting the environmental impacts of operating nuclear plants over their forty year history. Preparation and presentation of a GES should stream line the relicensing process. Classifying the environmental impacts into the four categories suggested by NUMARC will enable the NRC and interested parties to focus on the more significant and/or site specific impacts.

RG&E appreciates the opportunity to participate in the rulemaking process and will continue to do so through our involvement with NUMARC.

Sincerely,

Robert C. McCreedy

Robert C. McCreedy
Vice President
Ginna Nuclear Production

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