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VIRGINIA POWER

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Chief, Rules Review and Directives Branch
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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Gentlemen:

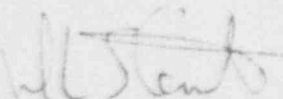
VIRGINIA ELECTRIC AND POWER COMPANY
COMMENTS ON PROPOSED GENERIC LETTER FOR
LINE-ITEM TECHNICAL SPECIFICATION IMPROVEMENTS
TO REDUCE TESTING DURING POWER OPERATION

Virginia Power has reviewed the Nuclear Regulatory Commission's (NRC's) Federal Register notice dated March 31, 1993 which proposed to issue a generic letter on line item technical specification improvements. This draft generic letter presents the results of the NRC staff examination of technical specification surveillance requirements that require testing during power operation. The draft generic letter also provides guidance to assist licensees in preparing a license amendment request to implement the recommendations that resulted from the examination.

We endorse this proposed generic letter with the following comment. The generic letter should explicitly state that licensees are free to implement any individual section of the guidance and are not obligated to implement the entire guidance whether or not it may be applicable to their plant. Although this is implied by the voluntary nature of the proposal, explicit definition of this position would represent a positive clarification.

The NRC staff should be commended for the proposed generic letter as it provides both an increase in overall plant safety while also providing a significant reduction in regulatory requirements that are burdensome to licensees.

Very truly yours,


W. L. Stewart

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