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NRC

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June 27, 1994

DOCKET NUMBER

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PG&E Letter DCL-94-134

PETITION RULE PRM 50-60
(59 FR 17499)

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

Attn: Docketing and Service Branch

Docket No. 50-275, OL-DPR-80

Docket No. 50-323, OL-DPR-82

Diablo Canyon Units 1 and 2

Virginia Electric and Power Company: Petition for Rulemaking,
Emergency Planning

Gentlemen:

PG&E is submitting comments in response to the notice in the Federal Register (59 FR 17499), dated April 13, 1994, and invitation to comment on Virginia Electric and Power Company's (VEPCO's) petition for rulemaking to amend 10 CFR 50.54(t) by changing the frequency with which each licensee conducts independent reviews of its emergency preparedness program. PG&E supports the petition and believes that the proposed change is warranted.

Power reactor licensee proficiency and effectiveness in emergency planning has improved steadily to the point where annual audits no longer provide a significant benefit, let alone a benefit commensurate with the cost in dollars and diverted resources. For the nuclear power industry, emergency planning audit deficiencies over the past few years have been largely absent or narrowly focused. Furthermore, adequate safeguards exist to ensure that the effectiveness of licensee emergency planning does not deteriorate during the two-year interval for audits.

The proposed relaxation of the annual audit requirement complements VEPCO's March 1993 rulemaking petition to reduce the frequency of mandatory emergency preparedness exercises from annually to biennially. By alternating the mandatory emergency preparedness audit and exercise, the NRC will still maintain a formal mechanism to annually verify program effectiveness.

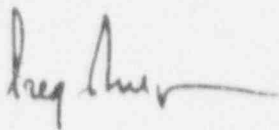
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Based on our experience at Diablo Canyon, as well as documented industry performance, we agree with VEPCO that annual audits are no longer necessary to ensure an adequate level of emergency response capability. Biennial audits would allow licensees to concentrate available audit resources in areas of observed weakness based on performance. Because the costs associated with the annual audit requirement are not commensurate with its safety benefits, amending the emergency preparedness rules to permit biennial audits could provide a net safety benefit.

Sincerely,

A handwritten signature in dark ink, appearing to read "Greg Rueger", with a long horizontal flourish extending to the right.

Gregory M. Rueger

cc: L. J. Callan
Mary H. Miller
Kenneth E. Perkins
Sheri R. Peterson
Diablo Distribution

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