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

DOCKET NUMBER

PETITION RULE PRM 50-60
(59 FR 17499)

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Attention: Docketing and Service Branch

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
COMMENTS ON VIRGINIA POWER COMPANY'S PETITION
FOR RULEMAKING TO CHANGE THE FREQUENCY OF INDEPENDENT
REVIEW OF EMERGENCY PREPAREDNESS PROGRAM

This letter provides comments on Virginia Power Company's petition for rulemaking to change the frequency with which each licensee conducts independent reviews of its emergency preparedness program from annually to biennially.

South Carolina Electric & Gas Company (SCE&G) agrees that the frequency of independent review of the emergency preparedness program should be more performance-based than schedule-driven.

SCE&G recommends that the Nuclear Regulatory Commission achieve and maintain a common frequency requirement for all nuclear programs requiring an independent review, to include emergency preparedness. The frequency, scope, and depth of all independent reviews should be based on program performance indicators and such that all aspects of a program are audited within a 36 month interval.

SCE&G appreciates the opportunity to review and provide comment on this petition for rulemaking.

Very truly yours,

John L. Skolds

RAM:lcd

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NSRC
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