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

JUN 17 1994

DOCKET NUMBER

PETITION RULE PRM ~~50~~-60  
(59 FR 17499)

ATTENTION: Docketing and Services Branch

SUBJECT: Virginia Power; Filing of Petition for Rulemaking  
59 Fed. Reg. 17499 - April 13, 1994  
Request for Comments

On April 13, 1994, (59 FR 17499), the Nuclear Regulatory Commission (NRC) published for public comment a notice of petition for rulemaking titled "Virginia Power; Filing of Petition for Rulemaking." Florida Power and Light Company (FPL), as the licensed operator of two nuclear power plant units in Dade County, Florida and two nuclear power plant units in St. Lucie County, Florida, submits the following comments.

FPL concurs with the Virginia Power petition regarding a change in the frequency that licensees conduct independent reviews of their emergency preparedness program from annually to biennially. Virginia Power cites eight reasons for the request to change this requirement. FPL focuses on two of these reasons: 1) the present good performance of industry emergency plans and programs, and 2) the consistency with the guidance in Regulatory Guide 1.33, "Quality Assurance Program Requirements (operation)."

With respect to the first reason, FPL's Emergency Plan (EP) programs have maintained a long standing SALP one rating, and are managed with the emphasis on making the necessary improvement/modifications to maintain this excellent performance. FPL's performance supports Virginia Power's statement that Industry performance to date indicates excellent implementation and effective emergency preparedness programs.

With respect to the second reason, FPL concurs with Virginia Power that the existing requirement to conduct an annual audit is not of itself necessary to adhere to the underlying purpose of 10 CFR 50.54(t). FPL's Quality Assurance performance monitoring program is structured toward a performance based auditing philosophy and includes audits of the various drills and exercises in addition to routine audits of the Emergency Planning Program. FPL believes the performance-based overview with a two-year minimum interval is sufficient to satisfy 10 CFR 50.54(t).

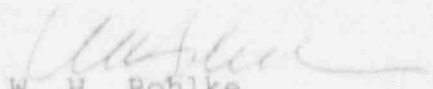
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The Virginia Power petition is consistent with the recommendation of the NRC Regulatory Review Group Summary and Overview Report, and is consistent with FPL's current Quality Assurance initiatives regarding audit frequencies. By employing a 24 month minimum audit frequency for emergency preparedness, the Nuclear Industry is provided with additional flexibility to use their resources more effectively in focusing on other performance improvement opportunities.

FPL appreciates the opportunity to comment on this petition.

Very truly yours,



W. H. Bohlke  
Vice President  
Nuclear Engineering and Licensing

WHB/spt