



Nebraska Public Power District

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April 15, 1991

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Mr. Samuel J. Chilk
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
ATTN: Docketing and Service Branch

Subject: Notice of Proposed Rulemaking:
Codes and Standards for Nuclear Power Plants
56 Federal Register 3736 (January 31, 1991)

Dear Mr. Chilk:

In accordance with the above Notice of Proposed Rulemaking, the Nebraska Public Power District (the District) submits the following comment on the NRC's proposed amendment to 10CFR50.55a. The District appreciates this opportunity to express its views on the promulgation of this proposed rule.

The proposed text of 10CFR50.55a(g)(6)(ii)(A)(1) would revoke all previously granted reliefs for reactor vessel shell weld examinations for the Inservice Inspection Interval in effect on the effective date of the rule. This includes reliefs for those licensees with fewer than 40 months remaining in the Inspection Interval that is in effect on the effective date of the rule. The District requests that consideration be given to revising the proposed text of 10CFR50.55a(g)(6)(ii)(A)(1) to specify that previously granted relief requests for examination of reactor vessel welds will not be revoked for those licensees who elect to defer the augmented examination as allowed in 10CFR50.55a(g)(6)(ii)(A)(3). This will allow those licensees who are able to defer the augmented reactor vessel examination to the first period of their next 10 year Inservice Inspection Interval to do so, while still meeting their current interval examination requirements without submitting new relief requests.

The District believes that incorporating this comment into the proposed rule will not weaken the purpose of the proposed rule, but rather would clarify it and aid licensees in their implementation of it. Your consideration of this comment is appreciated.

Sincerely,

G. R. Horn
Nuclear Power Group Manager

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