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October 6, 1994

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Response to Administrative Letter 94-11, "Request for Voluntary Comment on the
Pilot Program for NRC Recognition of Good Performance By Nuclear Power
Plants"

Baltimore Gas and Electric Company appreciates the opportunity to comment on the subject program. We have reviewed the comments submitted by the Nuclear Energy Institute (NEI). We agree with their comments on the subjectivity of how the NRC measures the achievement of excellence. In every case, the NRC should subjectively develop opinions from documented facts contained in NRC inspection reports and operational data. Opinions developed in this manner form a reasonable basis for placing a plant on the list of "good performers."

However, we do not agree that the program for recognition of good performance should be discontinued. We think that the NRC has an obligation to inform Congress, financial institutions, and the general public about the overall safety performance of the nuclear industry. This should include recognition of those plants that consistently maintain a high level of safety. From our perspective, the "good performer program" is an appropriate mechanism for NRC to identify these plants.

Should you have any further questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,

A handwritten signature, likely of Robert E. Denton, is written over a horizontal line. The signature is in cursive and appears to read "R. E. Denton".

RED/JMO/dlm

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