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Dave Morey
Vice President
Farley Project

Southern Nuclear Operating Company
the southern electric system

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John C. Hoyle, Acting Secretary
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

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BRANCH

Comments on
Procurement of Commercial Grade Items by Nuclear Power Plant Licensees
(59 Federal Register 53372 of October 24, 1994)

Dear Sir:

Southern Nuclear Operating Company has reviewed the proposed rule, "Procurement of Commercial Grade Items by Nuclear Power Plant Licensees," published in the Federal Register on October 24, 1994. In accordance with the request for comments, Southern Nuclear is in total agreement with the NEI comments that are to be provided to the NRC. Additionally, Southern Nuclear would like to offer the following comment: The NRC indicates that the new definitions of Basic Component, Commercial Grade Item, Critical Characteristic, Dedication and Dedicating Entity would apply only to Part 50 licensees while the current definitions of the Basic Component, Commercial Grade Item and Dedication would continue to be applicable to Part 30, 40, 60, 61, 71 and 72 licensees. Furthermore, the definitions of Critical Characteristics and Dedicating Entity would not be applicable to licensees except those under Part 50. It will be confusing and costly for nuclear plant operators to procure and dedicate equipment under different regulatory requirements due to the fact that many Part 50 licensees have additional licenses. The current wording of the regulations indicate that a Part 50 licensee that holds additional licenses would be working under differing definitions. The evaluation and reporting of potential defects would also be more difficult. It is recommended that the new definitions be applicable and consistent to licensees who hold other licenses as well as a Part 50 license.

Should you have any questions, please advise.

Respectfully submitted,

D. N. Morey
D. N. Morey

DNM/JMG

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cc: Southern Nuclear Operating Company
Mr. R. D. Hill, Plant Manager

U. S. Nuclear Regulatory Commission, Washington, DC
Mr. B. L. Siegel, Licensing Project Manager

U. S. Nuclear Regulatory Commission, Region II
Mr. S. D. Ebnetter, Regional Administrator
Mr. T. M. Ross, Senior Resident Inspector