

CP&L

Carolina Power & Light Company
Raleigh NC 27601

FILE: X-X-0576
X-X-0590
X-X-1075

Secretary
U.S. Nuclear Regulatory Commission
ATTN: Docketing and Service Branch
Washington, D.C. 20555

Subject: Comments on Proposed Rules - Standard Design Certification for the U. S. Advanced Boiling Water Reactor Design (60 FR 17902, April 7, 1995) and Standard Design Certification for the System 80+ Design (60 FR 17924, April 7, 1995)

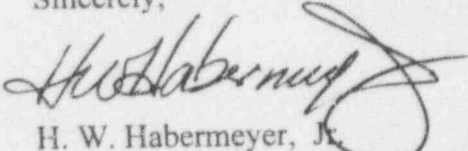
Dear Sir:

These comments are submitted on behalf of Carolina Power & Light (CP&L) Company and support the position on the two proposed Standard Design Certification rules noted above which were submitted by the Nuclear Energy Institute (NEI) on behalf of the industry.

The NRC is to be commended for incorporating several innovative concepts in 10 CFR Part 52. However, CP&L agrees with the industry position that the proposed rules contain several significant process deficiencies which will threaten the economic viability of these designs. CP&L strongly urges the NRC to correct these deficiencies in the final issuance of the rules. This is essential to the continued viability of the nuclear option.

Please contact me at (919) 546-6901 if you have questions about these comments.

Sincerely,


H. W. Habermeyer, Jr.

FAE/fae/pnm

cc: Mr. F. A. Emerson
Mr. A. Garrou
Mr. J. C. Presley
Mr. R. E. Rogan
Mr. L. Rowell
Mr. R. Simard (NEI)

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PROPOSED RULE **PR 52**
DOCKETED **(60 FR 17902)**
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August 7, 1995

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Vice President
Nuclear Services and
Environmental Support

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