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VIRGINIA POWER

Serial No. GL 95-015
NL&P/EJL

The Secretary of the Commission
Attn: Docketing and Service Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

DOCKET NUMBER **PR**
PROPOSED RULE **52**
(60FR17924) **19**

Dear Sir:

**10 CFR PART 52
STANDARD DESIGN CERTIFICATION FOR THE U. S. ADVANCED BOILING
WATER REACTOR DESIGN AND THE SYSTEM 80+ DESIGN
PROPOSED RULE
FEDERAL REGISTER / Vol. 60, No. 67 / APRIL 7, 1995 / p. 17902**

The Nuclear Regulatory Commission (NRC) is proposing to approve by rulemaking standard design certifications for the U. S. Advanced Boiling Water Reactor design and the System 80+ design. The NRC is proposing to add new appendices to 10 CFR Part 52 for the design certifications. This action will allow applicants or licensees intending to construct and operate either of these designs to do so by referencing the appropriate proposed appendix.

The design certification rules are cornerstones of a new, more efficient licensing process

which is critical to the continued viability of nuclear power in the United States. The rules seek to achieve the early resolution of safety issues, enhanced safety and reliability of future nuclear power plants, a more predictable and stable licensing process, and standardization of future plants. We strongly support the Commission's goals for the regulation. The NRC is to be commended for its efforts in developing this major licensing reform initiative.

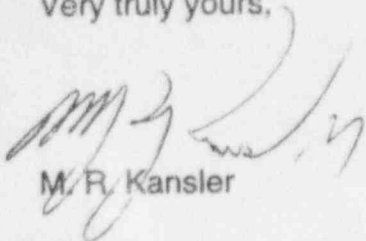
It is vital that the regulations actually achieve the Commission's goals. We are concerned that a number of stipulations in the proposed rule, contrary to the Commission's goals, introduce licensing uncertainties and unnecessary burdens on future licensees. These concerns are articulated in detail in the Nuclear Energy Institute's (NEI) comment letter to the NRC on this subject. It is important that these issues be resolved. We fully endorse NEI's comments.

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We appreciate the opportunity to provide comments on the proposed rule.

Very truly yours,



M. R. Kansler

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