



GPU Nuclear Corporation

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U. S. Nuclear Regulatory Commission
Att: Document Control Desk
Washington, DC 20555

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station
Operating License No. DPR-16
Docket No. 50-219
Three Mile Island Nuclear Station, Unit 1
Operating License No. DPR-50
Docket No. 50-289
Request for Extension for 10 CFR Part 20 Compliance

The purpose of this letter is to request that the implementation date for complying with the revised 10 CFR Part 20, Standards for Protection Against Radiation, be extended to January 1, 1994.

The revised 10 CFR Part 20 was published in the Federal Register on May 21, 1991 with the final implementation date of January 1, 1993. Originally, specific guidance for implementation, in the form of Regulatory Guides, was also expected to be issued at the same time. There are twelve (12) Regulatory Guides that the Staff plans to either issue for the first time or make significant changes to support the new regulations. However, to this date, only seven (7) draft Regulatory Guides have been issued. We have recently transmitted extensive comments on those draft Regulatory Guides to NUMARC who are coordinating to gather industry comments to be forwarded to you in the very near future.

Because of the sweeping nature of the new regulations it is extremely difficult and inefficient to implement the required changes without having necessary finalized regulatory guidance which supports major elements of the new regulations.

We request that the Commission extend the final compliance date by one year to January 1, 1994 with the understanding that all necessary Regulatory Guides will be available in final form during the first calendar quarter of 1992. If these guides are delayed further, then additional time should be allowed to develop the implementation capability in concert with this guidance. The

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requested date, January 1, 1994, coincides with the final implementation date specified for Agreement States and should allow ample opportunity for the NRC staff to prepare the guidance necessary to support our needs to effectively implement and comply with the new regulation.

Very truly yours,



J. Knubel

Licensing & Regulatory Affairs Director

JK/YN/plp

cc: Administrator, Region 1
NRC Resident Inspector
Oyster Creek NRC Project Manager