

TU ELECTRIC

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November 8, 1995

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

C. Lance Terry  
Group Vice President, Nuclear

Secretary, U. S. Nuclear Regulatory Commission  
Attn: Docketing and Service Branch  
Washington, DC 20555

DOCKET NUMBER  
PROPOSED RULE 60.72, 73, 75  
(60FR42079) (2)

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
COMMENTS ON PROPOSED RULEMAKING

REF: 1) 60 Fed. Reg. 42079, August 15, 1995

2) Nuclear Energy Institute (NEI) letter from  
Mr. Thomas A. Tipton dated November 13, 1995  
to Secretary, Nuclear Regulatory Commission  
in response to 60 FR 42079

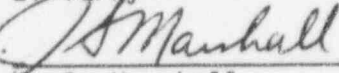
Gentlemen:

In Reference 1 the NRC requested information and comments concerning proposed rulemaking on Safeguards for Spent Nuclear Fuel or High-Level Radioactive Waste. The proposed rulemaking would modify four parts of existing 10 CFR (Parts 60, 72, 73 and 75) and clarify safeguards requirements for both NRC and DOE installations as follows: independent spent fuel storage installations (ISFSIs), decommissioned power reactors, monitored retrievable storage (MRS) installations, and geologic repository operations areas (GROA).

TU Electric endorses the Nuclear Energy Institute (NEI) comments contained in Reference 2 regarding the proposed rulemaking. The NEI comments are primarily concerned with the proposed amendments to Parts 72 and 73 for ISFSI security. The NEI letter describes a number of concerns with the proposed rules and includes comments on the specific rule modification wording. TU Electric shares the NEI concerns and supports the NEI proposed changes to the specific rule modification wording.

Sincerely,

C. L. Terry

B.   
J. S. Marshall  
Generic Licensing Manager

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PDR PR  
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CLW/grp

c - Mr. T. J. Polich, NRR  
Mr. T. E. Tipton, NEI