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Gentlemen:

DRAFT REGULATORY GUIDE DG-1022
EMERGENCY PLANNING AND PREPAREDNESS

Virginia Power has reviewed Draft Regulatory Guide DG-1022, "Emergency Planning and Preparedness for Nuclear Power Plants." We endorse the proposed Revision 3 to Regulatory Guide 1.101 as it allows an alternate method for developing Emergency Action Levels. In addition to endorsing comments from the Nuclear Management and Resource Council, Virginia Power offers the following comment with regard for the development of a regulatory position in this area.

The proposed revision appears to require utilities to choose either method and not allow use of beneficial sections of the two methodologies. We would suggest that consideration be given to allowing use of portions of both methodologies, especially with regard to Unusual Event Classifications. The segregation of methodologies in states which contain more than one utility or site could lead to the same event being reported under 10CFR50.72 at one location and as an Unusual Event at another. We believe that this could cause confusion within certain state/local agencies.

Should you have any questions regarding our concerns, please contact us.

Very truly yours,

J. P. O'Hanlon

for W. L. Stewart

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