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

Subject: VIRGIL C. SUMMER NUCLEAR STATION  
DOCKET NO. 50/395  
OPERATING LICENSE NO. NPF-12  
COMMENTS ON FITNESS FOR DUTY REPORTING REQUIREMENTS

South Carolina Electric & Gas Company (SCE&G) hereby submits comments on 10 CFR Part 26, Fitness-for-Duty program (FFD), in response to the Nuclear Regulatory Commissions (NRC) request for comments as published in Federal Register Notice, Volume 60, No. 231, pages 61717-61718.

In response to the published questions:

"1. Is the proposed collection of information necessary for the NRC to properly perform its functions? Does the information have practical utility?"

Response: The only justified benefit from this report would be to trend the data from the industry to determine if the programs are effective in reducing drug and alcohol abuse in the work place. Unless the NRC is actively pursuing a proposed rulemaking to adjust the testing requirements the report and trending of the data is not justified.

"2. Is the burden estimate accurate?"

Response: Yes, the burden estimate does adequately reflect the resources expended to meet the reporting requirement at Virgil C. Summer Nuclear Station.

"3. Is there a way to enhance the quality, utility, and clarity of the information to be collected?"

Response: If continuation of the report is adequately justified, the NRC could enhance the requirement by reducing the periodicity from semi-annual to annual.

"4. How can the burden of the information collection be minimized, including the use of automated collection techniques or other forms of information technology?"

Response: The burden could be minimized by decreasing the periodicity to an annual report instead of the current semi-annual report. If the data is not being actively utilized, the burden of the report should be eliminated. The information could be provided directly to an NRC Inspector upon request.

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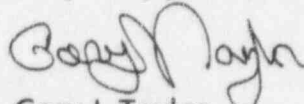


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Should there be any questions, please call at your convenience.

Very truly yours,

  
Gary J. Taylor

RAM/GJT/ews

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