



PROPOSED RULE 19-20
(57 FR 21216)

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Executive Vice President
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June 11, 1992

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Secretary
United States Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Docketing and Servicing Branch

SUBJECT: Comments on Proposed Rule to Extend Implementation
of the New 10CFR20

Dear Sir:

This letter provides the Niagara Mohawk Power Corporation comments on the proposed rule to extend the implementation date of the revised 10CFR Part 20, "Standards of Protection Against Radiation," as noted in the Federal Register of May 1992 (57 Fed. Reg. 21216).

Niagara Mohawk supports adoption of the proposed rule by the NRC. We believe that changing the required implementation date to January 1, 1994 will result in a more effective and efficient implementation of the revised Part 20. The proposed date provides the necessary time for all licensees to review the new and revised regulatory guides to clarify key points of the revised Part 20. The proposed date change will also allow for more consistency between NRC licensed facilities and those of Agreement States than would have resulted with the existing one year difference in implementation dates. The proposed extension will allow the Nine Mile Point Nuclear Station (and other licensees) to better allocate resources to implement the new requirements, while maintaining current functions to protect public and worker safety.

Our support for the January 1, 1994 implementation date is based on the current status of supporting regulatory activities. It is our understanding that all regulatory guides will be issued prior to the end of this year. Further, additional guidance regarding the preparation and submittal of proposed operating license amendments needed to implement the revised Part 20 will be issued within the next few months. Any delays in these actions would diminish the advantages outlined above.

We believe that current radiation protection programs at nuclear power plants adequately protect public and worker health and safety. It would be imprudent to rush the schedule after all the years it has taken to develop the revised Part 20, especially since significant additional protection will not be achieved by earlier implementation. We support the NRC

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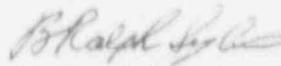
United States Nuclear Regulatory Commission

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proposal to adjust the implementation date and encourage continued initiatives by the NRC toward successful implementation.

We appreciate the opportunity to provide our comments on this very important issue.

Sincerely,



B. Ralph Sylvia
Exec. Vice President - Nuclear

BRS/ECG/lmc

xc: S. W. Wilczek, Jr., VP Nuclear Support, NMPC
D. K. Greene, Manager Licensing, NMPC
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