



KANSAS GAS AND ELECTRIC COMPANY

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VICE PRESIDENT - NUCLEAR

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OFFICE OF SECRETARY  
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BRANCH

KMLNRC 85-147  
Subj: Comments on Proposed Rule on Communication  
Procedure Amendments

Dear Sir:

On March 16, a proposed rulemaking on communication procedures was published in the Federal Register for comment (50FR11884). The proposed rule change was developed to clarify the correct mailing address and number of copies required for NRC submittals.

Kansas Gas and Electric Company wholeheartedly supports this effort to simplify guidance on this issue, provide clarification of procedure, and reduce the copying and postage burden to the utilities. Attachment A contained additional KG&E comments on the proposed rulemaking.

Yours very truly,

GLK:bb  
Attach  
xc:PO'Connor (2), w/a  
JCummins, w/a

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Acknowledged by card.....

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KG&E Comments on Communications Procedures Amendments

1. While the proposed changes in 50.4 cover the majority of submittals, the following types of submittals were not clearly covered by the draft text:

- A. Response to Notice of Violation-10CFR2.201(c)
- B. Response to Order to Show Cause-10CFR2.202(a)(2)
- C. Responses to Civil Penalties-10CFR2.205(b)
- D. Respiratory Protection Program 10CFR20.103(g)
- E. Theft or loss of licensed material-10CFR20.402(b)
- F. Failure to comply or existence of a defect-10CFR21.21(B)
- G. Operator License Applications-10CFR55.10, 55.60
- H. Notification of disability of operator-10CFR55.41
- I. Material Status Report 10CFR70.53
- J. Security events-10CFR73.71
- K. Response to Miscellaneous Requests for Additional Information from the NRC
- L. Response to NRC inspection reports
- M. Responses to Generic Letters
- N. Advance notice of FSAR or Emergency Plan Changes
- O. Responses to I&E Bulletins and Notices

Also the proposed section 10CFR50.4(b)(2)(xviii) appears to cover many of these submittals. However, subsection xviii should be modified to better define what is covered by this item.

- 2. No identification is made as to other NRC branches which may require copies of a document (e.g. Office of Inspection and Enforcement).
- 3. 10CFR50.4 should define which submittals are required to be oathed.
- 4. The matrix format of Regulatory Guide 10.1 is useful for summarizing these requirements. Regulatory Guide 10.1 should be updated to include current requirements.