

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

1630 Chestnut Street Tower II

DOCKET NUMBER

PROPOSED RULE

PR-50  
(50 FR 11884) ①

June 3, 1985

DOCKETED  
USNRC

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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Attention: Docketing and Service Branch

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Dear Sir:

Tennessee Valley Authority (TVA) is pleased to provide comments on the proposed rule to 10 CFR Part 50 concerning communication procedures as noticed in the March 26, 1985 Federal Register (50 FR 11884-11891).

TVA supports the rule and believes the guidance in communications procedures will be beneficial to licensees and applicants. Enclosed are TVA's specific comments on the proposed rule requested by the Commission on 10 CFR 50.4.

We appreciate the opportunity to comment.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

*J. A. Homer*

J. W. Hufham, Manager  
Licensing and Regulations

Enclosure

cc (Enclosure):

Executive Secretary  
Advisory Committee on Reactor Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Mr. Tom Tipton  
AIF, Inc.  
7101 Wisconsin Avenue  
Bethesda, Maryland 20814

DS10-11  
add: Steve Scott, W-548

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PDR PR  
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Acknowledged by card

JUN 7 1985

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ENCLOSURE

TVA RESPONSE TO PROPOSED RULE (10 CFR 50.4) - COMMUNICATIONS PROCEDURES AMENDMENTS

1. 10 CFR 50.4 (a) Address Requirements

We request that correspondence get to the correct party expeditiously. This change requires that correspondence be addressed to the "U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C." Does this mean that the letter is addressed to the Document Control Desk or that it is addressed to others in NRC (e.g., H. R. Denton, Hugh Thompson, or J. G. Davis) and mailed to the Document Control Desk?

2. 10 CFR 50.4 (b) and 50.4 (b) (2) - Copies of Correspondence

These sections specify that one copy of the correspondence should be submitted to the appropriate NRC Resident Inspector, if applicable. The condition "if applicable" is vague. When is a submittal to the resident "applicable"? This should be clarified.

3. 10 CFR 50.4 (e) - Citation of Regulatory Requirement

This requirement is unclear as to scope. Should the general or specific regulations(s) be cited? When a letter involves many regulations, should all be cited? Are there some letters for which a citation of applicable regulation is not appropriate? This is the type of requirement which appears appropriate, but it is the type of requirement which will require extensive interpretation and will evolve through trial and error.

4. 10 CFR 50.36 - Technical Specifications

This change to the reporting requirements in technical specifications will require that all operating license be revised. Pursuant to 10 CFR 170.23 and 10 CFR 2.204, these amendments to the administrative controls section of technical specifications should not be subject to fees.