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DOCKET NUMBER PR-50 (15)
PROPOSED RULE
(50 FR 16506)



Georgia Power

the southern electric system

DOCKETED
USNRC

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June 13, 1985

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

Attention: Docketing and Service Branch

Subject: Specific Exemptions Rulemaking

Dear Secretary:

On April 26, 1985, the Nuclear Regulatory Commission ("NRC") published in the Federal Register a proposed amendment to its regulations. Specifically, the NRC proposes to revise 10 CFR Section 50.12(a). Section 50.12(a) specifies the instances in which the NRC may grant exemptions from the requirements of regulations. Georgia Power Company is pleased to have the opportunity to submit these comments on the proposed rulemaking. Georgia Power is an electric utility serving over 1,000,000 customers in the State of Georgia and is an NRC licensee for the Edwin I. Hatch Nuclear Plant.

Georgia Power believes that the proposed Section 50.12(a) provides valuable guidance for applicants, licensees, the staff and the public by articulating present NRC policies. Furthermore, the proposed rule assures desirable regulatory flexibility while assuring the public health and safety through application of the specific standards contained in Section 50.12(a)(2). In summation, Georgia Power Company supports the adoption by the commission of the proposed rule.

One area of clarification appears appropriate. The exemption provided for by compliance with proposed Section 50.12(a)(2)(iv) is designed to address "schedular" exemptions from regulations. In the preamble to the final rule, a clarification that this exemption is separate from other schedule-related relief from regulatory requirements granted by the Commission or its staff would be appropriate. Frequently these requirements are referred to as "commitments" made by a licensee to perform a particular activity, such as a modification of facilities, during a particular period or prior to a particular date.

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Acknowledged by card

DSIO
add: J. L. Cameron
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Secretary
U. S. Nuclear Regulatory Commission
June 13, 1985
Page two

Georgia Power appreciates the opportunity to submit these comments for Commission consideration.

Sincerely yours,

L. T. Gucwa

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AD/mb

xc: J. T. Beckham, Jr.
H. C. Nix, Jr.
J. N. Grace (NRC- Region II)
Senior Resident Inspector