



MIDDLE SOUTH  
UTILITIES SYSTEM

**LOUISIANA**  
**POWER & LIGHT**

142 DELARONDE STREET  
NEW ORLEANS, LOUISIANA

• P.O. BOX 8008  
70174-8008

• (504) 388-2345

July 1, 1985

W3P85-2148  
A4.05

Mr. Hugh L. Thompson, Jr., Director  
Division of Licensing  
Office of Nuclear Reactor Regulation  
Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: Implementation of Integrated Schedules for Plant  
Modifications (Generic Letter 85-07)

Dear Mr. Thompson:

Louisiana Power & Light Company is pleased to provide comments on Generic  
Letter 85-07.

LP&L believes that the NRC Policy on Integrated Living Schedule is a meritorious  
one. The NRC's Statement of Policy and Planning Guidance for 1985 states in  
part:

"An integrated implementation schedule for new and existing  
requirements reflecting relative priorities should be  
established for each power reactor licensee."

The Integrated Living Schedule program recognizes the needs and limited  
resources of both the NRC and the utility operating a nuclear power plant. An  
Integrated Living Schedule program further assures the protection of the public  
health and safety by optimizing plant operation through a continuing process of  
identifying, integrating, prioritizing, selecting and scheduling plant better-  
ment activities on the basis of safety, regulatory, reliability, operability,  
and economic factors.

LP&L has in the past and continues to promote the optimum management of plant  
activities. Accordingly, scheduling and planning and other management controls  
have been carefully planned and instituted at LP&L. We are therefore carefully  
following industry activities in this area. A team of LP&L personnel, represent-  
ing various organizational disciplines, has been assigned to track industry  
efforts and formulate a more specific position for LP&L. We anticipate, however,  
that this effort will be a long term effort, and therefore at this time, we do  
not presently plan to negotiate with nor are we prepared to meet with the NRC on  
this matter. Nonetheless, we believe an Integrated Living Schedule has many  
virtues which need to be rigorously evaluated and pursued by the industry and  
the NRC. LP&L therefore encourages continued industry and NRC effort on this  
goal.

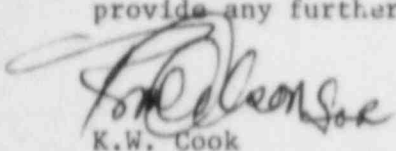
8507100446 850701  
PDR ADOCK 05000382  
P PDR

50-382

Accol  
1/0

Mr. Hugh L. Thompson, Jr.  
W3P85-2148  
Page 2

Please feel free to contact me or Robert J. Murillo should we be able to provide any further information on this matter.

A handwritten signature in dark ink, appearing to read 'K.W. Cook', is written over the typed name.

K.W. Cook  
Nuclear Support & Licensing

KWC/RJM/pcl

cc: B.W. Churchill, W.M. Stevenson, R.D. Martin, D.M. Crutchfield, J. Wilson,  
T.A. Flippo, G.W. Knighton