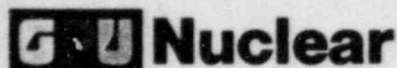


DOCKET NUMBER
PROPOSED RULE **PR-50**
(50 FR 11884) (2)



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USNRC

May 24, 1985

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Mr. Samuel J. Chilk
Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, DC 20555

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Dear Mr. Chilk:

Subject: Comment Request for Proposed Rule on
Communications Procedure Amendments

The staff of GPU Nuclear Corporation (GPUN) herewith submits comments on the subject proposed rule. Comments were requested in a March 26, 1985 Federal Register notice (50 FR 11884).

GPUN has reviewed the NRC proposal to amend 10 CFR Part 50 regarding procedures for submitting correspondence, reports, applications and written communications. We support the NRC's intent to standardize these requirements; this proposal should accomplish that objective. However, there are two points that we would like to mention.

First, the requirement to provide thirty-seven (37) copies of all documents covered under paragraphs 50.4(b)(1)(i) through (xxi) is onerous and, in light of the fact that currently only five (5) copies are needed for Security Plan changes and three (3) copies for Emergency Plan changes, excessive. Secondly, there appears to be a discrepancy in Section 50.4. It can be read that both paragraphs 50.4(b)(1)(xv) and 50.4(b)(2)(xxi) impose different requirements for the same information. We suggest that paragraph 50.4(b)(1)(xv) specify that it refers to paragraphs 50.109(a) and (b) while 50.4(b)(2)(xxi) refers only to 50.104(c), as stated.

Sincerely,

J. R. Thorpe
Director
Licensing & Regulatory Affairs

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add. Steve Scott, W-548

Acknowledged by card..... MAY 29 1985

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GPU Nuclear Corporation is a subsidiary of General Public Utilities Corporation