



UNION ELECTRIC COMPANY
1901 Gratiot Street, St. Louis

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PETITION RULE PRM 50-39 (9)
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Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Attn: Docketing and Service Branch

Gentlemen:

ULNRC-1159

PROPOSED RULE
SOUTHERN CALIFORNIA EDISON COMPANY
FILING OF PETITION FOR RULEMAKING

Reference: Federal Register, Vol. 50, No. 97, dated May 20, 1985
pp. 20799-20800

Union Electric has reviewed the Southern California Edison Company Filing of Petition for Rulemaking and offers the following comment. The requirement that exists is that the licensee assure that arrangements are made for medical services for contaminated injured individuals. This was interpreted to include, among other things, the development of arrangements for medical services for members of the offsite public who might be exposed to excessive amounts of radiation as a result of a serious accident.

As indicated by Southern California Edison, the magnitude of dose consequences from severe accidents at nuclear power plants is not such that exposure of the public would result in the need for immediate emergency medical attention. Arrangements have been made, however, to provide emergency treatment for onsite individuals who could be significantly contaminated and seriously injured during the course of an accident.

Union Electric feels that the proposed wording of 10CFR50.47(b)(12) simplifies and clarifies the interpretation of the requirements and should therefore be adopted.

Very truly yours,

Donald W. Capone

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