



Angus S. King, Jr.
Governor

Kevin W. Concannon
Commissioner

STATE OF MAINE
DEPARTMENT OF HUMAN SERVICES
AUGUSTA, MAINE 04333

February 11, 1997

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: Maine Yankee Atomic Power Company - Proposed Change No. 203-115 kV Offsite Power Requirements

Gentlemen:

In accordance with 10 CFR 50.91 (b) the State of Maine has recently received the proposed amendment requesting the NRC to review this application under 10 CFR 50.91 (a)(6) as an "exigent" Technical Specification change. The State objects to the proposed request for the following reasons:

- a) The State wishes to ensure that the full 30 days, as provided under the Sholly Amendment, is available to provide ample time to review the proposed amendment, instead of being constrained to rush its review. There are complexities to the remedial actions of this Tech Spec change that we wish to investigate further.
- b) It is our understanding that the NRC can expedite the review process without nullifying the 30 day comment period, similar to what was done for the 1995 amendment approval of the Westinghouse sleeving process.
- c) We believe that, if the NRC were to approve the exigent request, it could place an undue burden on its resources to fulfill their chapter 0350 commitment to the NRC Commissioners on Maine Yankee's restart approval.

We are cognizant that Maine Yankee and the NRC have been working diligently to resolve this issue over the past few months. If this was the sole issue for plant startup, the state could comprehend Maine Yankee's request. However, this is one of several issues that have to be resolved prior to startup. For instance, at today's management meeting it was mentioned that the cable

ADD 1/0

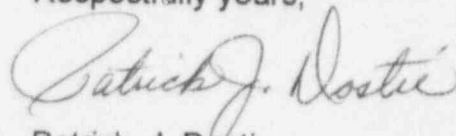
9702190300 970211
PDR ADOCK 03000309
P PDR

separation issue probably would not be completed before March 15, unless 24 hour coverage could be instituted promptly. We are concerned that in hurrying to get the plant restarted some issues could be overlooked.

Finally, we believe that by allowing the public ample time to comment on licensing issues it should foster a more trusting relationship and help broaden the NRC's integrity with Maine's citizens.

The State will provide an assessment of the proposed change under separate cover. Should you have further questions on this issue, please contact me. My telephone number at the Maine Yankee facility is 207-882-5349.

Respectfully yours,



Patrick J. Dostie
State Nuclear Safety Inspector
Office of Nuclear Safety
Division of Health Engineering

cc:

Dr. Dora Anne Mills, State of Maine
Mr. Clough Toppan, State of Maine
Mr. Robert Schell, State of Maine
Mr. Uldis Vanags, State of Maine
Mr. Jimi Yerokun, NRC
Mr. James Hebert, Maine Yankee