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Duquesne Light Company

Beaver Valley Power Station
P.O. Box 4
Shippingport, PA 15077-0004

61FR 43794

Aug. 26, 1996

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RULES REVIEW & DIRECTIVES BR.
November 11, 1996

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SUSHIL C. JAIN
Division Vice President
Nuclear Services
Nuclear Power Division

Mr. David L. Meyer
Chief, Rules Review and Directives Branch
U. S. Nuclear Regulatory Commission
Mail Stop T-6D59
Washington, DC 20555-0001

Subject: Beaver Valley Power Station, Unit No. 1 and No. 2
BV-1 Docket No. 50-334, License No. DPR-66
BV-2 Docket No. 50-412, License No. NPF-73
Draft Supplement 3 to NUREG-0654/FEMA-REP-1

Dear Mr. Meyer:

Duquesne Light Company (DLC) is responsible for the operation of Beaver Valley Power Station Units 1 and 2. DLC is submitting the comments below on draft Supplement 3 to NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." The draft is an interim use and comment document developed jointly by the Nuclear Regulatory Commission (NRC) and the Federal Emergency Management Agency (FEMA).

DLC agrees with the draft document in that:

- a) "prompt evacuation of the area that is near the plant is much more effective in reducing the risk of early health effects than sheltering for severe accidents," and
- b) "evacuation is the preferred initial protective action for severe accidents, barring any constraints to evacuation."

DLC currently addresses the intent of the draft document by providing for a minimum protective action recommendation based on operational conditions of evacuating a two mile radius, 360 degrees and a five mile downwind wedge.

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IRP-11 Guidelines
Manuals
X IDER-5 Facility License

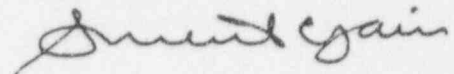


NUREG

(61FR43794)

Thank you for the opportunity to comment on this issue. If you have any questions concerning the above comments, please contact Mr. Roy K. Brosi, Manager, Nuclear Safety Department, (412) 393-5210.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sushil C. Jain".

Sushil C. Jain