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(10)

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DOCKET NUMBER

PROPOSED RULE

1.1-50(43FR 37473)

October 6, 1978

Mr. Samuel J. Chilk  
Secretary  
U. S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Attention: Docketing and Service Branch

Re: Appendix E - Emergency Plans for  
Production and Utilization Facilities;  
Advance Notice of Proposed Rulemaking  
(43 Fed. Reg. 37473 (August 23, 1978))

Dear Mr. Chilk:

On August 23, 1978, the Nuclear Regulatory Commission published in the Federal Register an advance notice that it is considering the initiation of a rulemaking proceeding to amend its regulations relating to emergency plans for production and utilization facilities. The NRC solicited comments and suggestions concerning the proposed amendment by October 10, 1978.

While the advance notice was published on August 21, 1978, it was not formally transmitted to NRC licensees until September 21, 1978, when Mr. Minogue transmitted a "Notice to NRC Licensees" announcing the proposed amendment. This Notice has stimulated substantial interest among those of our clients who are NRC licensees.

We intend to submit comments on the proposed amendment on behalf of these clients. However, we have not had sufficient time to formulate our comments since the clients did not express their desire to comment until after they received Mr. Minogue's notice in late September.



Transmitted by card. 10/11

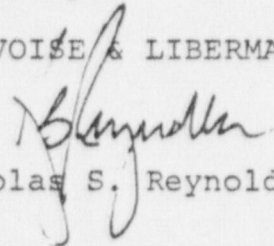
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Accordingly, we respectfully request that the Commission extend the comment period deadline to October 24, 1978. Since this matter relates to an advance notice of rulemaking and since issuance of any final amendment to the regulations would not occur for some time, an extension of the comment period deadline to October 24 should not delay the orderly development of an NRC position. On the other hand, such an extension should provide interested members of the public ample time to develop informed and meaningful comments on this important issue.

Sincerely,

DEBEVOISE & LIBERMAN

  
Nicholas S. Reynolds