



VERMONT YANKEE NUCLEAR POWER CORPORATION

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10-1-1999
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BVY 99-117

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The Honorable Richard A. Meserve
Chairman
U.S. Nuclear Regulatory Commission
Mail Stop O-16 C1
Washington, DC 20555-0001

DOCKET NUMBER
PROPOSED RULE **PR 50**
(64FR22580)

Subject: 10CFR50.55a Supplemental Proposed Rule (64 Fed. Reg. 22580)

REC'D BY 4504
Dear Chairman Meserve:

DEC 99 3:10

The NRC should be commended for the proposed rulemaking to eliminate the requirement for licensees to update their Inservice Inspection and Testing programs beyond an established baseline edition and addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (*the Code*). Reconsideration of this requirement is warranted because there is no substantial increase in safety commensurate with the cost of implementing the present regulation. Vermont Yankee also strongly supports adoption of the 1989 edition of the Code, including the 1989 addenda, as the baseline version for use under the proposed rule.

I understand that the ASME, individuals from the industry, and NRC staff involved in ASME activities have communicated views opposing the proposed rule. Nevertheless, rulemaking consistent with the provisions of the backfit rule and the demonstrated threshold of safety improvement afforded by the 1989 Code and addenda represents sound regulatory policy.

In conclusion, I support the proposed rule to eliminate the 120-month update requirement, and also support establishing the 1989 edition of the Code, including the 1989 addenda, as the approved baseline version. Please feel free to contact me if you would like to discuss these matters further.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION

Ross P. Barkhurst
President and Chief Executive Officer

- cc: The Honorable Nils J. Diaz, Commissioner, NRC
- The Honorable Greta J. Dicus, Commissioner, NRC
- The Honorable Edward M. McGaffigan, Commissioner, NRC
- The Honorable Jeffrey S. Merrifield, Commissioner, NRC
- Dr. William D. Travers, Executive Director for Operations, NRC

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