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OFFICE OF THE SECRETARY
RULEMAKING AND ADJUDICATION STAFF
U. S. NUCLEAR REGULATORY COMMISSION

Office of the Secretary
Attn: Rulemaking and Adjudication Staff
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

DOCKET NUMBER
PROPOSED RULE PR 20
(64FR35090)

**SUSQUEHANNA STEAM ELECTRIC STATION
COMMENTS TO FEDERAL REGISTER NOTICE
TITLED "RELEASE OF SOLID MATERIALS AT
LICENSED FACILITIES: ISSUES PAPER, SCOPING
PROCESS FOR ENVIRONMENTAL ISSUES, AND
NOTICE OF PUBLIC MEETINGS" - 64FR35090
PLA-5151**

Docket Nos. 50-387
and 50-388

The purpose of this letter is to provide PP&L, Inc. (PP&L) comments on the Federal Register Notice titled "Release of Solid Material at Licensed Facilities: Issues Paper and Scoping Process, and Notice of Public Meetings", published in the Federal Register on June 30, 1999 (64FR35090).

The operation of nuclear power plant facilities requires that personnel and materials enter and depart the facilities on a routine basis. Operational and regulatory decisions regarding the acceptability for release of potentially contaminated materials are an ongoing consideration of plant operations.

Currently, NRC regulates the release of potentially contaminated solid material through regulation, regulatory guidance, and case-by-case exemptions. This approach is resource intensive and at times difficult to implement. The NRC has recognized these impediments and is considering rulemaking to clarify release standards for materials and residual radioactivity.

PP&L commends the NRC on this initiative. We believe that the NRC should develop a clear, dose-based release standard that provides a consistent regulatory approach for the release of potentially contaminated material from nuclear facilities. The standard should be practical and measurable so that it can be implemented by industry without an undue burden. It also needs to be verifiable by the regulator and the public. A standard in the range of a few millirem per year would meet these criteria. Levels

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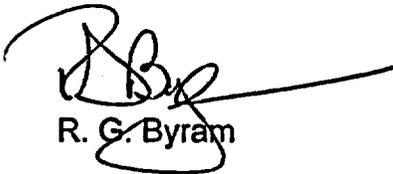
consistent with existing EPA drinking water standards and current airborne effluents standards should be considered.

The international implications of a NRC release standard should also be considered. The NRC should continue to work with the International Atomic Energy Agency (IAEA) to ensure consistency with international regulations to avoid the development of a standard that may have adverse impacts on international trade.

PP&L appreciates the opportunity to comment on this important issue. We encourage the NRC to continue to pursue the development of a standard which is prudent, practical, reasonable and consistent to assure that the release of solid materials is fair and equitable to all involved stakeholders.

Please contact Mr. Robert D. Kichline at (610) 774-7705 if there are questions concerning these comments.

Sincerely,



R. G. Byram

Copy: NRC Region I
Mr. S. L. Hansell, NRC Sr. Resident Inspector, SSES
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