

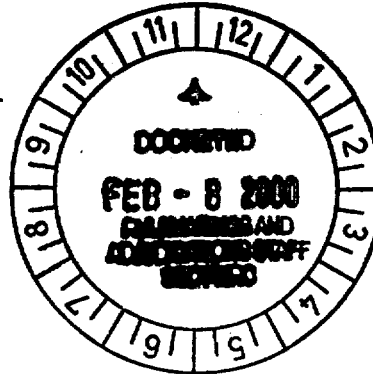


TXU

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Log # TXX-00030
File # 883

January 31, 2000

Annette L. Vietti-Cook
Secretary of the Commission
ATTN: Rulemakings and Adjudications Staff
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

DOCKET NUMBER
PETITION RULE PRM 30-62
(64FR57785)

**SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
ENDORSEMENT OF NEI COMMENT LETTER on
"Petition for Rulemaking to Require Employee Protection Training" (64
Fed. Reg. 57785; October 27, 1999)**

- REF: 1) 64 Fed. Reg. 57785; October 27, 1999
- 2) Nuclear Energy Institute (NEI) letter, addressed to Secretary,
U. S. Nuclear Regulatory Commission, dated December 30, 1999

Dear Ms. Vietti-Cook:

This letter is in response to the request for comment (Reference 1) on the subject petition for rulemaking to require that licensees provide management with training regarding the NRC's employee protection regulations.

NEI has established an Executive Task Force to gain valuable insight from its member nuclear utilities. The results of the NEI Executive Task Force review are being submitted per the NEI comment letter (Reference 2).

TXU Electric has reviewed and endorses the NEI comment letter. TXU Electric agrees with the NEI discussed issues, responses, and rationale with the addition of the following comment:

On February 26, 1997, in a document published in the Federal Register (62 FR 8785), the NRC requested public comment on a proposal for a standardized approach to

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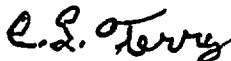
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ensuring that licensees established and maintained a safety-conscious work environment. That proposal, among other provisions, established certain remedial actions that the Commission could require when it determined that a particular licensee had failed to establish and maintain a safety-conscious work environment. On February 6, 1998, the NRC published in the Federal Register (63 FR 6235) a notice of withdrawal of the previously published proposal along with summaries of comments received from, among others, the Nuclear Energy Institute and the Union of Concerned Scientists concerning the proposal. In responding to the request for comment on the proposal to establish a standardized approach to ensuring that licensees established and maintained a safety-conscious work environment the Union of Concerned Scientists had stated that it believed that the Commission's May 1996 Policy Statement on the "Freedom of Employees in the Nuclear Industry to Raise Safety Concerns Without Fear of Retaliation" (61 FR 24336; May 14, 1996), as well as rigorous and consistent enforcement of existing regulations, is sufficient to achieve the NRC's objectives.

In light of the Union of Concerned Scientists earlier position as evidenced by opposition to the proposed standardized approach and avowed confidence in existing regulations, the current petition for rulemaking to require licensees to provide management with training regarding the NRC's employee protection regulations is perplexing and cannot be supported by TXU Electric.

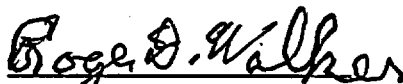
This communication contains no new licensing basis commitments regarding CPSES Units 1 and 2.

Sincerely,



C. L. Terry

By:



Roger D. Walker
Regulatory Affairs Manager

RAS/grp

c - Ellen Ginsberg, NEI