

121 Main Street  
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914-961-2000

DOCKET NUMBER  
PROPOSED RULE **PR-50** **6**  
**(52 FR 45344)**

DOCKETED  
USNRC



'88 JAN 28 A8:41

OFFICE  
January 25, 1988  
JPN-88-002  
IPN-88-002

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

ATTN: Docketing and Service Branch

Subject: James A. FitzPatrick Nuclear Power Plant  
Docket No. 50-333  
Indian Point 3 Nuclear Power Plant  
Docket No. 50-286  
Comments on NRC Proposed Policy Statement on  
Integrated Schedules for Implementation of  
Plant Modifications

Dear Sir:

This letter provides the Power Authority's comments on the proposed policy statement "Integrated Schedules for Implementation of Plant Modifications", published in the Federal Register, dated November 27, 1987 (52 FR 45344).

The Authority agrees with the proposed policy that integrated schedules for regulatory requirements and other improvements should be established on a voluntary basis. The integrated schedule is an excellent tool for resource allocation. It prioritizes activities necessary for safe, reliable, and efficient power generation. The Authority also agrees with the major elements to be addressed in an integrated schedule plan. The list of elements contained in the policy statement is inclusive without being unduly prescriptive.

The Authority has concerns about the integrated schedule as a license amendment. According to the proposed policy, the intent of the integrated schedule license amendment is to assure the timely scheduling and completion of regulatory modifications. The policy states that if a new NRC requirement is imposed, no schedule exemption would be required. This statement requires elaboration. The policy statement should clearly state

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add: S. Black, WF-12EA

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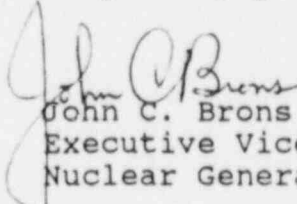
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that new regulatory requirements will not impose an implementation date on plants having an integrated schedule license amendment. The policy statement should also say that new regulatory requirements will specify that these plants should propose a date in accordance with their integrated schedule, for NRC approval.

Plants with an integrated schedule plan submitted to the NRC, but without a license amendment, can have implementation dates imposed. These plants can use the integrated schedule as a negotiating tool, but they would still require schedule exemptions if they could not meet the imposed dates. Guidance, regarding the amount of information or the level of detail required to support a scheduler exemption, should be included in the policy statement.

Should you have any questions regarding this matter, please contact Mr. J. A. Gray, Jr. of my staff.

Very truly yours,

  
John C. Brons  
Executive Vice President  
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cc: U.S. Nuclear Regulatory Commission  
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