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OFFICE OF SECRETARY
RULEMAKINGS AND
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Ms. Annette L. Vietti-Cook
Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

DOCKET NUMBER

PETITION RULE PRM 50-75

(67FR 16654)

ATTN: Rulemakings and Adjudications Staff

**COMMENTS ON NEI PETITION FOR LARGE BREAK LOCA REDEFINITION
PROPOSED RULEMAKING (PRM-50-75 DATED APRIL 8, 2002)**

Dear Ms. Vietti-Cook:

Virginia Electric and Power Company (Dominion) and Dominion Nuclear Connecticut (DNC) appreciate the opportunity to comment on the subject petition for rulemaking. We view the proposal in the petition as an important element in creating a regulatory structure that reflects today's state of knowledge and operating experience.

The double-ended break design basis required by the current regulations has far-reaching effects on plant design and operation. However, over 30 years of operating experience and improvements in engineering knowledge and methods have shown that a double-ended break of the largest reactor coolant system piping should no longer be a dominant LWR safety criterion. Adoption by the NRC of the proposed petition would enable more regulatory and industry resources to be focused on areas that are of more benefit to the safe and reliable operation of the nation's nuclear power plants.

Also, as described in the petition, the existing regulations are inconsistent in their treatment of the dynamic effects and other design effects of a postulated design basis pipe break. Adoption of the proposed petition would allow the NRC to make the regulations more consistent, which would be expected to increase confidence in the regulatory process.

The industry and its various owners groups have collectively worked together to develop this NEI petition. This change has been identified by industry as the single, most significant, improvement that can be made to 10 CFR Part 50. To date this effort has had significant technical and financial support from the industry. Success with LBLOCA redefinition will foster continued support and involvement.

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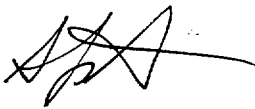
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It is recognized that there are technical issues to be resolved related to the implementation of the revised rule. However, the resolution of these issues can occur in parallel with the rulemaking, and the rulemaking should not hinge on the prior resolution of all implementation issues. The industry has actively supported redefinition of the maximum break size and frequently encouraged the NRC to move forward with it as our highest priority for risk-informing the technical requirements in the regulations.

If you have any questions, please contact

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Respectfully,



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