

Public Service
Electric and Gas
Company

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Vice President and Chief Nuclear Officer

February 9, 1989

NLR-N89009

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch

Gentlemen:

POLICY STATEMENT ON EXEMPTIONS FROM REGULATORY CONTROL
SALEM AND HOPE CREEK GENERATING STATIONS
DOCKET NOS. 50-272, 50-311 AND 50-354

PSE&G fully supports the Commission's effort to establish a responsible Below Regulatory Concern (BRC) policy. The policy statement in the Federal Register on December 12, 1988, if enacted, will result in cost savings to PSE&G in the hundreds of thousands of dollars, and will provide guidance to both PSE&G and its regulators in the allocation of their resources.

Attached, please find our comments to the specific questions that were raised in the Federal Register.

Sincerely,



Attachment

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Licensing Project Manager - Salem

Ms. K. Halvey Gibson
Senior Resident Inspector - Salem

Mr. C. Y. Shiraki
Licensing Project Manager - Hope Creek

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Ms. J. Moon, Interim Chief
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COMMENTS ON SPECIFIC QUESTIONS

1. **As lower levels of radiation exposure are projected, should lower levels of benefit be required for practice justification?**

Public Service Electric and Gas (PSE&G) believes that a "sliding scale" of benefit approach should be used. This would eliminate a "hurdle" that would be necessary to justify a small or minor practice. For example, a minor spill of radioactive water contaminating a small quantity of soil may not surmount a minimum benefit bench mark.

2. **In establishing its exemption policy, should the Commission exclude certain practices for which there appear to be no reasonable justification?**

PSE&G understands that the resources of the NRC are limited; exclusion of practices that do not appear to have reasonable justification only makes business sense.

3. **In considering proposals for exemptions, should the Commission evaluate the social acceptability of practices?**

PSE&G feels that the social acceptability of a practice should be utilized in development of the bases of the parameters which determine acceptability of an exemption and not used as a separate term in a formula for acceptance or rejection of a proposal.

4. **Should the Commission determine a practice to be unjustified if non-radioactive economical alternatives exist?**

PSE&G does not believe that a practice should be judged on the merit of the presence of an economical non-radioactive alternative by the NRC. Rather, the practice should be evaluated solely on the exposure of affected individuals.

5. **If such a collective dose criterion is needed, what is the basis for this need?**

PSE&G does not believe that a collective dose criterion is needed. In fact, it would not serve any practical purpose. The individual "trivial" dose criterion is a conservative, analytical approach to assessing harm to members of the public who will be affected. A collective dose at these levels is several orders of magnitude below that from variations in natural background.

6. By appropriate choices of exemption criteria and through its evaluations of specific exemption proposals in implementing the policy, the Commission intends to assure that it is unlikely that any individual will experience exposures which exceed the 100 mrem per year (1mSv per year) limit.

PSE&G believes that the 100 mrem per year limit is reasonable, but that any conflict between this limit and that of 40CFR190 should be resolved between NRC and EPA to avoid regulatory confusion.

Additionally, PSE&G believes that "**(b) a measure of societal impact to the exposed population**", is confusing, and wishes that a more elaborative statement replace it, since this may be the methodology by which the Commission is evaluating the use of numerical data to define the region where ALARA has been achieved.