



Portland General Electric Company

William J. Lindblad Vice President



April 17, 1980

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PROPOSED RULE PR-2,50 ①
(45 FR 20491)

Secretary of the Commission
ATTN: Docketing and Service Branch
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Sir:

We have reviewed the proposed amendments to 10 CFR Parts 2 and 50 pertaining to "No Significant hazards Consideration" (Federal Register Vol. 45, No. 62, March 28, 1980, Page 20491).

The following comment is offered on Section 50.91(b2):

A Commission determination that no significant hazard consideration exists because operation in accordance with a proposed license amendment does not "create the possibility of an accident of a type different from any evaluated previously" could pose major problems of interpretation and litigation. There are infinite numbers of insignificant types of accidents that can be postulated for any license amendment, particularly by individuals whose interest is to needlessly delay nuclear plant operation and to utilize the public hearing process as a publicity forum for their broader objective of shutting down necessary generating plants. This provision of the proposed 10 CFR 50 amendment should be deleted. Alternatively, the phrase should be restated as follows:

"...(2) create the possibility of a credible accident of a type different from any evaluated previously, and having potential consequences approaching those specified in 10 CFR Part 100, or..."

Acknowledged by card. *[Signature]*

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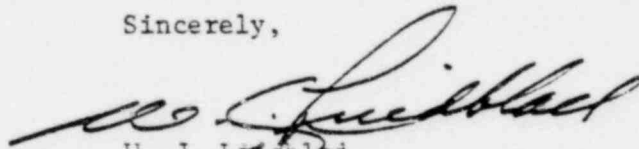
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The following comment is offered on Section 50.58(2):

A provision should be added to state that proposed license amendments need not be prenoticed in the Federal Register if they result from conditions that are prescribed by an Atomic Safety and Licensing Board. Prior approvals by the Commission that must be granted for facility changes meeting established criteria that are prescribed by license conditions or Technical Specifications should also be exempt from prenoticing in the Federal Register.

Your serious consideration of these comments is appreciated.

Sincerely,



W. J. Lindblad
Vice President
Engineering-Construction

WJL/JWL/ma