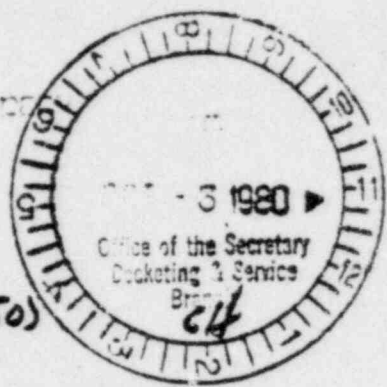


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Portland General Electric Company



DOCKET NUMBER
PROPOSED RULE PR 50,51,100
(45 FR 50350)

September 29, 1980

Federal Register Comments

JWL-434-80

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

Dear Sir:

Portland General Electric Company offers the following comments related to the Advance Notice of Rulemaking regarding revision of reactor siting criteria, as promulgated in the July 29, 1980 Federal Register (Volume 45, 50350). Our comments primarily relate to items A, B, C and G.

We generally agree with the three conceptual goals developed and used by the Siting Policy Task Force in reaching their recommendations. In particular, we believe that siting should be strengthened as a factor in defense in-depth by establishing requirements for site approval of future facilities that are independent of plant design considerations. However, we have several comments as follows:

1. Consideration should be given to combining this rulemaking with the rulemaking for degraded core cooling. This would ensure a more balanced treatment and development of criteria for siting and plant design. We believe disjoint rule-makings will have a tendency to promote incongruities between site selection criteria and plant design criteria.
2. The three-tier approach would require that residual risks be taken into account in individual licensing proceedings. We believe residual risk discussions are too open-ended and undisciplined to be discussed in individual proceedings and should be confined to rulemakings for use as one means to develop and establish appropriate criteria for both site selection and plant design.
3. We also object to the three-tier approach because it would constitute an implicit requirement for an Applicant and the NRC Staff to determine the best site available, i.e., "how well one can reasonably do in a particular area under consideration", as opposed to identifying sites that are

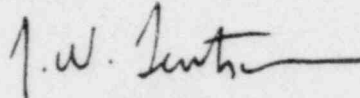
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"among the best that can reasonably be found". The latter concept is that espoused in the proposed rulemaking on alternative site reviews.

We believe that the above comments should be given serious consideration in order for a proposed rule to be of meaningful benefit to both future Applicants and the public.

Sincerely,



J. W. Lentsch
Manager of Generation Licensing & Analysis
Generation Engineering-Construction Division

JWL/DRS/4lmlA4

c: Mr. Lynn Frank, Director
State of Oregon
Department of Energy