



Portland General Electric Company

DOCKET NUMBER PR 50,51
PROPOSED RULE (45 FR 40101)

16



September 10, 1980

Federal Register Comments

JWL-385-80

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

Dear Sir:

Portland General Electric Company, Construction Permit applicant for the proposed Pebble Springs Nuclear Plant, offers the following comments related to the Statement of Interim Policy regarding nuclear power plant accident considerations under the National Environmental Policy Act of 1969, as promulgated in the June 13, 1980 Federal Register (Volume 45, 40101).

We generally support the approach taken by the Commission as interim guidance for the treatment of accident risk considerations in NEPA reviews. In the longer term, however, we would expect that compliance with requirements flowing from rulemakings for emergency planning, siting and degraded core cooling would constitute an acceptable basis for eliminating, as an interim requirement, the need to include the kind of probabilistic assessments envisioned by this policy statement in Environmental Impact Statements and Environmental Reports.

Sincerely,

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

JWL/DRS/41m8B15

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

Acknowledged by card... 9/15/80...

A

801014002!