

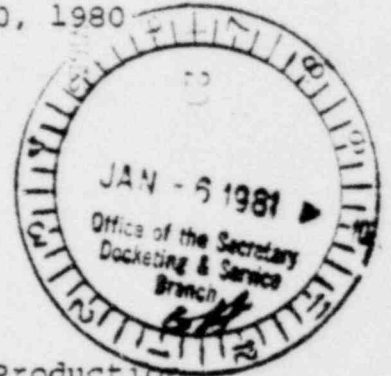


PROJECT NUMBER PR 50
PROPOSED RULE 45FR 65474

31

Public Service Electric and Gas Company 80 Park Place Newark, N.J. 07101 Phone 201 430-7000

December 30, 1980



Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docketing and Service Branch

Subject: 10 CFR Part 50, Domestic Licensing of Production
and Utilization Facilities; Consideration of
Degraded or Melted Cores in Safety Regulation,
Advance Notice of Proposed Rulemaking (45 FR
65474), October 2, 1980

Dear Sir:

Public Service Electric and Gas Company has reviewed the
subject Advance Notice of Rulemaking. We have participated
in the development of substantial comments submitted by the
AIF Committee on Reactor Licensing and Safety and hereby
endorsed those comments.

Our position can be summarized as follows:

- . The objectives of the proposed rulemaking can only be achieved within the context of an established safety goal and accepted methodology for its use.
- . Given the establishment of a safety goal and supporting methodology, the capability of existing state-of-the-art design features to cope with non-design basis conditions must be determined. This determination, based on current licensee actions and technical findings, would focus on risk reduction through prevention of core degradation.
- . Only after the above preliminary bases have been established, can consideration be rationally given to what, if any additional design features may be required to assure the protection of the health and safety of the public.

L-4117.50

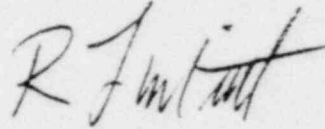


8102090045

12/30/80

It is our intent to participate in the envisioned rulemaking process through the Industry Degraded Core Rulemaking Program (IDCOR) which has been recently initiated.

Very truly yours,

A handwritten signature in cursive script, appearing to read "R. L. Mittl".

R. L. Mittl
General Manager -
Licensing and Environment

CC Chairman, AIF Policy Committee (B. Lee, Jr.)