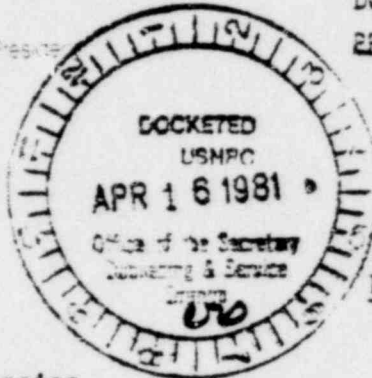




Portland General Electric Company

Earl D. Withers Vice President

DOCKET NUMBER
PROPOSED RULE PR-50 (33)
(46 FR 18045)



April 13, 1981

Federal Register Comments

Secretary of the Commission
Attn: Docketing and Service Branch
U. S. Nuclear Regulatory Commission
Washington DC 20555

Dear Sir:

Portland General Electric Company offers the following comments related to the proposed rule regarding licensing requirements for pending Construction Permit (CP) and manufacturing license applications, as promulgated in the March 23, 1981 Federal Register (Vol. 46, 18045). Portland General Electric Company is lead applicant for the proposed Pebble Springs Nuclear Plant, one of six currently pending CP applications for which the NRC staff review has been suspended since the TMI-2 accident on March 28, 1979. Our comments relate to the new paragraph (e) added to Section 50.34 as follows:

1. Section 50.34(e)(2)(xix)

The wording of this section implies that all the instruments cited must be provided. The addition of "and/or" in lieu of "and" in the last sentence would better convey the intended meaning.

2. Section 50.34(e)(2)(xxi)

The requirement that motive and control components be designed to safety grade criteria is inconsistent with the applicable requirement of NUREG-0737 (which is referenced in NUREG-0718). Section (B) should be revised to read as "Motive and control power connections to emergency power sources are through devices qualified in accordance with safety grade requirements".

3. Sections 50.34(e)(2)(xvii) and 50.34(e)(2)(xxii)

The alpha-numeric designations corresponding to the related action plan items in NUREG-0718 (and NUREG-0660)

2-4-1, PR-50

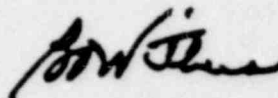
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are incorrect. The correct designations should be
II.E.5.1 and II.K.1.22, respectively.

We appreciate the opportunity to comment on this proposed rule.

Sincerely,



Bart D. Withers
Vice President
Nuclear

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