



Portland General Electric Company

Bart D. Withers Vice President

DOCKETED
USNRC

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH
August 17, 1982

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

DOCKET NUMBER
PROPOSED RULE

14
PR-50
(47 FR 15801)

Dear Sir:

Codes and Standards

PGE has reviewed the proposed change to 10 CFR 50.55a contained in the April 13, 1982 Federal Register and has the following comments:

1. General - PGE supports the comments on the newly proposed 10 CFR 50.55a rules made by the members of the American Nuclear Society Nuclear Power Plant Standards Committee. This committee has spent many hours in developing standards which are meaningful to both the NRC and the utility industry and it has our full support.
2. General - Many utilities are being faced with cancellations and deferments which may render previously acceptable equipment as outdated under the revised 10 CFR 50.55a. Flexibility should be added to the code to allow these utilities to either use this equipment at other sites or allow other utilities to purchase and use this equipment at their plants as long as it can be shown that the equipment provides an equivalent level of quality and safety. This might be accomplished by adding a provision to the end of paragraph (a)(3)(ii) which would state that a demonstration of hardship or unusual difficulties is not required for equipment being transferred from a cancelled or deferred plant. Note that NRC approval would still be required in this case.
3. Item (c)(4) - "With construction permits issued prior to" should be changed to "with construction permit applications docketed prior to" in order to be consistent with Item (d)(1).

Sincerely,

Bart D. Withers
Vice President
Nuclear

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