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DECEMBER 10 1990
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Mr. Samuel Chilk
Secretary
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Docketing and Service Branch

Re: Draft Policy Statement - Possible
Safety Impacts of Economic
Performance Incentives
55 FR 43231 (Oct. 26, 1990)
Request For Comments

Dear Mr. Chilk:

At 55 FR 43231, the NRC presented and invited comments on its draft policy statement with respect to the possible safety impacts of economic incentive programs established by state commissions regulating electric utilities. These comments are submitted on behalf of the Florida Power & Light Company (FPL), a licensed operator of two nuclear power plant units in Dade County, Florida and two units in St. Lucie County, Florida.

FPL shares the Commission's concern that certain forms of economic performance incentive programs, particularly those with sharp thresholds, have the potential for adversely affecting nuclear plant operation and public health and safety. We agree with the NRC that the use of NRC performance assessments, indicators and SALP ratings in incentive programs, and programs that reward performance based on short time intervals, could have an adverse effect on long-term improvement in the reliability of the reactor, main generator and their support systems. Incentives to operate a facility with potential safety problems, or to start up a facility prior to being fully ready, merely to meet an operational goal are clearly undesirable.

FPL does support incentive programs which reward long-term improvements in operation and maintenance; such programs could lead to improved reliability and operational safety. We believe that the NRC, utilities and the utility commissions should work together to establish incentive programs that support safety and reliability goals. An open forum, as suggested in the draft policy statement, to review, discuss and agree upon economic incentives would clearly be in the best interest of all concerned.


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Thank you for this opportunity to comment on this draft policy. If you have any questions on our comments, or would like information on the Florida incentive program, please contact us.

Yours truly,


W. H. Bohlke
Vice President
Nuclear Engineering and Licensing

WHB/lef