STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC UTILITY CONTROL

November 30, 1990
In Reply, Please Refer To: 90 DEC -6 P3:58
EL:PMO

Samuel J. Chilk, Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Proposed NRC Policy Statement Concerning Possible Safety Impacts of State Economic Performance Incentive Programs relating to Nuclear Power Plants

Dear Mr. Chilk:

The following are the Connecticut Department of Public Utility Control's ("CDPUC") comments regarding the above proposed policy statement.

The CDPUC concurs with the NRC's proposed Policy Statement concerning economic performance incentive programs.

It is unclear what, if any, oversight or control the NRC might assume over state initiatives to impose or change economic performance incentive programs. The NRC's role should remain advisory.

A formal procedure may be preferable to provide for prompt NRC comment or assessment of proposed state commission actions regarding such programs. Otherwise, NRC's review of the possible safety impacts of specific incentive programs is likely to occur only after implementation.

Although monitoring of State imposed penalties may be appropriate it is not clear how the NRC will evaluate or determine whether such penalties have affected public safety and health or caused licensees' to adopt unsafe operation or maintenance practices.

The NRC should routinely provide the results of its proposed annual survey of incentive programs to state commissions with economic jurisdiction.

The CDPUC appreciates the opportunity to comment on this important matter.

Sincerely yours,

Peter G. Boucher
Chairperson

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