

BEFORE THE NUCLEAR REGULATORY COMMISSION

Draft Policy )  
Statement Regarding Safety ) Docket No. 7590-01  
Impacts of Economic )  
Incentive Programs )

COMMENTS

The Alabama Public Service Commission has reviewed the Draft policy statement of the NRC regarding possible safety impacts of economic performance incentives. The Alabama Commission shares the NRC's continuing concern regarding safety of nuclear power plant operations. The Alabama Commission has considered the use of economic incentives, but has not implemented any incentive programs for electric utilities at this time.

The Alabama Commission supports the effort to continue to gather information regarding incentive programs and believes that it will be helpful to continue to receive this information as it becomes available. The information contained in the most recent survey (NUREG/CR 5509) can be used in the development and modification of incentive programs.

We do believe, however, that it would be helpful for the NRC to comment in the survey on the manner in which it believes particular programs may have an impact on safety. It is not immediately clear why some of the programs that are included in

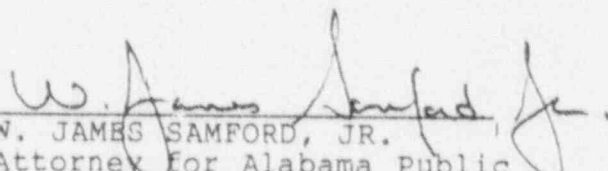
the survey are considered as a potential threat to public safety. A discussion of the NRC's perspective on the various programs will assist the Alabama Commission in making a more reasoned judgment regarding the programs presented.

To the extent that a "policy" statement is necessary or desirable to accomplish these ends, it would appear that the draft policy lacks the kind of specificity that would make the effort most productive. For example, it is unclear whether participation in the survey will be mandatory or voluntary. We believe that voluntary participation is the more prudent approach.

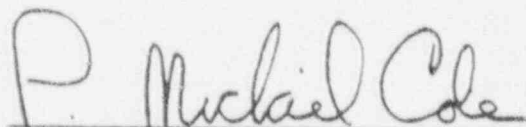
The Alabama Public Service Commission reserves the right to respond to the comments filed by other interested parties to this proceeding.

Respectfully submitted on this the 6<sup>th</sup> day of December, 1990.

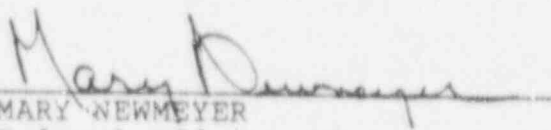
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