

SOUTH CAROLINA ELECTRIC & GAS COMPANY
POST OFFICE 764
COLUMBIA, SOUTH CAROLINA 29218

DOCKET NUMBER
PROPOSED RULE PR 50
47 FR 35996

O. W. DIXON, JR.
VICE PRESIDENT
NUCLEAR OPERATIONS

82 OCT 19 11:05
October 15, 1982

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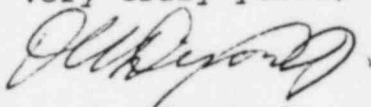
Mr. Samuel J. Chilk
Secretary of the Commission
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Virgil C. Summer Nuclear Station
Proposed Rule, "Applicability of
License Conditions and Technical
Specifications in an Emergency"

Dear Mr. Chilk:

As published in the August 18, 1982 Federal Register, the NRC proposed rule entitled, "Applicability of License Conditions and Technical Specifications in an Emergency," has been reviewed by South Carolina Electric and Gas Company (SCE&G) which submits the following comments: The concept is generally agreed to in that licensees should be allowed to deviate from licensing conditions or Technical Specifications when emergency conditions so warrant. It is suggested that the ruling be worded to allow each licensee the flexibility to grant personnel the authority to approve such actions within its organization. This would allow "Emergency Directors" the authority to make these decisions as opposed to limiting this authority to Senior Reactor Operators as suggested by Commissioner Gilinsky.

Should you have any questions, please contact us at your convenience.

Very truly yours,

O. W. Dixon, Jr.

RBC:OWD/fjc
cc: V. C. Summer
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PDR PR
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add: Charles Trammell
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Acknowledged by card 10/27/82 emp



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JACKET NUMBER **PR 50** (22)
 PROPOSED RULE
(47 FR 35996)

October 82, OCT 19 11:00

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Secretary of the Commission
 U.S. Nuclear Regulatory Commission
 Washington, D.C. 20555

Attention: Docketing and Service Branch

Subject: Proposed Rule - Applicability of License Conditions
 and Technical Specifications in an Emergency
 (47 FR 35996 8-18-82)

Dear Sir:

Commonwealth Edison has reviewed the subject Proposed Rule and strongly endorses the concepts of the proposal. Circumstances may arise which were not foreseen in the preparation of Technical Specifications. In some such circumstances literal adherence to the Technical Specifications may cause, rather than prevent problems. In such cases prudence may require operation outside of the Technical Specifications or approved procedures.

We believe that there should be specific provisions in the Operating License clearly indicating that the Technical Specifications are not intended to restrict or prohibit the licensee from undertaking, during the course of emergency conditions, any action necessary to protect public health and safety.

Additionally, we concur with Commissioner Gilinsky's view that the decision to operate outside of the Technical Specification be made by a senior reactor operator.

We appreciate having been given the opportunity to comment.

Respectfully,

L. O. DelGeorge

L. O. DelGeorge
 Director Nuclear Licensing

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Acknowledged by card. 10/27/82 emp