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Bart D. Withers Vice President

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September 3, 1982

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Secretary of the Commission
Attention Docketing and Service Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

DOCKET NUMBER
PETITION RULE PRM-50-33
(47 FR 29252)

Dear Sir:

National Emergency Management Association:
Filing of Petition for Rulemaking
(Docket No. PRM-50-33)

This letter is in response to the July 6, 1982 Federal Register request for public comment on the petition for rulemaking filed by the National Emergency Management Association (NEMA). The petition requested a reduction in the frequency of emergency training exercises at nuclear plants involving state and local governments. NEMA believes the current requirement for an annual exercise at each nuclear plant site within a state is imposing an impossible burden on state resources.

Portland General Electric agrees the exercise and drill requirements currently contained within 10 CFR 50 are burdensome for both licensees and offsite agencies. Portland General Electric supports reduced drill and exercise requirements. However, the specific changes requested by the petition do not achieve the desired result since they in effect increase the exercise requirements for licensees. In addition, the proposed rule is made more complex by introducing the new terms "full participation" and "partial participation".

Specifically, with respect to increased exercise requirements for licensees, the proposed rule requires that, "Each licensee at each site shall exercise annually its onsite emergency plan to test as much of the licensee emergency plan as is reasonably achievable". In essence, this rule will require a full-scale onsite exercise each year which tests all aspects of the onsite plan. Current rules permit small-scale onsite

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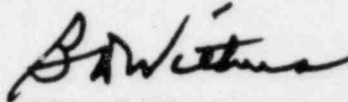
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exercises during years when full-scale exercises are not required, and permits full-scale exercises to be conducted in a manner which tests all major elements of the plan over a 5-year period. On these bases, Portland General Electric objects to this provision of the proposed rule.

Sincerely,



Bart D. Withers
Vice President
Nuclear

c: Mr. Lynn Frank, Director
State of Oregon
Department of Energy