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**PSEG**

DOCKET NUMBER  
PROPOSED RULE

PR 50  
53FR 27174  
U.S. NRC  
DOCKETED

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Public Service Electric and Gas Company, P.O. Box 236 Hancocks Bridge, New Jersey 08038

Nuclear Department

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August 17, 1988  
NLR - N88132

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

Attention: Docketing and Service Branch

Dear Mr. Chilk:

COMMENTS ON NRC PROPOSED RULEMAKING  
LICENSEE FLEXIBILITY DURING NATIONAL CRISIS  
SALEM AND HOPE CREEK GENERATING STATIONS  
DOCKET NOS. 50-272, 50-311, 50-354

Public Service Electric and Gas Company has reviewed the proposed rule (FR 27174, Dated July 19, 1988) and submits the following comments for consideration.

Although we are in agreement that licensees should be afforded reasonable flexibility in complying with plant Technical Specifications during a national crisis, we do not support issuance of the proposed rule in its present form due to a lack of discussion relative to implementation requirements. In our opinion, the cornerstone of effective crisis management is proper advance planning and, where practical, personnel training. For example, Emergency Plans in place at nuclear facilities across the country are designed to provide the necessary framework for formulating an appropriate response to postulated operational events. Plant operators are trained and tested on the procedures contained in these plans in order to provide a high degree of assurance that the health and safety of the public is safeguarded.

We therefore encourage the NRC to defer issuance of a final rule until such time as proper implementation guidance can be formulated. That guidance at a minimum should address the following issues:

- Security of communications between NPC/Governmental agencies and licensees during national crises;
- Guidance on developing and integrating reasonable national crisis contingency procedures into existing licensee programs;

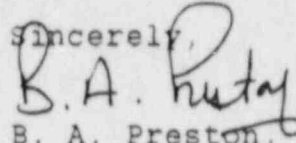
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- The division of responsibility between the NRC and the licensee during a national crisis;
- A definition of when the threat to the public due to the continued operation of the plant during a crisis is judged to be greater than that posed by the crisis itself;
- The assumption of liability in the event of miscommunications or adverse plant consequences occurring during or as a result of a national crisis.

We appreciate the opportunity to provide these comments. If there are any questions please feel free to contact us.

Sincerely,  
  
B. A. Preston,  
Manager - Licensing  
and Regulation

BC: Assistant Vice President - Nuclear Operations Support  
General Manager - Salem Operations  
General Manager - Hope Creek Operations  
General Manager - Licensing and Reliability  
General Manager - Nuclear Quality Assurance  
General Manager - Nuclear Safety Review  
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