



DOCKET NUMBER PR-50  
PROPOSED RULE

(53 FR 8924)

DOCKETED  
NRC

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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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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

April 18, 1988  
NLR-N88062

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

Attention: Docketing and Service Branch

Dear Mr. Chilk:

PROPOSED NRC RULEMAKING ON NOTIFICATION OF INSPECTOR VISITS  
SALEM AND HOPE CREEK GENERATING STATIONS  
DOCKET NOS. 50-272/50-311 AND 50-354

Public Service Electric and Gas Company (PSE&G) submits the following comments on NRC proposed rulemaking relative to licensee announcement of Inspectors (F.R. 8924 dated March 18, 1988).

- 1) The existing requirements delineated in 10 CFR 50.70(b)(3) provide the NRC with the required level of access identified in the proposed rulemaking. The incorporation of the proposed paragraph would simply add a redundant requirement.
- 2) Justifying the rulemaking on the basis that, "...there have been incidences in the past at several facilities.." gives the appearance that all licensees are being penalized for problems which exist at a few problem facilities. If access problems exist, the NRC should address them on an individual facility basis until such time as it is demonstrated that a generic problem exists.
- 3) As written, the proposed rule implies that the NRC would expect each licensee to monitor individual communications to assure that unauthorized notifications are not taking place. Due to the large number of personnel employed by plant operators and the degree of communication that occurs in the normal routine course of events, implementation of such a requirement would be virtually impossible.

The Energy People

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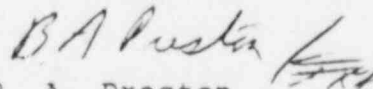
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- 4) It is not clear as to how the NRC would expect to implement enforcement action under the proposed rule. It would be inappropriate to cite a facility for unauthorized notifications which originate outside of the work place. Similarly, enforcement action against a facility without identification of the source of the unauthorized notification would also be inappropriate.

If there are any questions regarding these comments, please feel free to contact us.

Sincerely,



B. A. Preston  
Manager - Licensing  
and Regulation