



COMMIT NUMBER
PROPOSED RULE ~~PR 40, 72, 74, 75 & 150~~
(58 FR 6098)

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

Nuclear Department

93 APR 26 P2:31

APR 23 1993

NLR-N93062

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

(6)

Sir:

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
COMMENTS ON PROPOSED RULE, 58 FR 6098
LICENSEE SUBMITTAL OF DATA IN COMPUTER READABLE FORM

Public Service Electric & Gas Company (PSE&G), the licensee for the Salem and Hope Creek generating stations, has reviewed the subject proposed rule. As an affected Licensee and "Utilization Facility" of Special Nuclear Material (SNM), we take this opportunity to submit the following comments.

Taking advantage of today's technology, in an effort to replace paper form submittals in favor of computer readable format, is a worthwhile initiative. The proposed rule would prescribe the use of diskette media for data transfer. PSE&G suggests consideration be given to the use of on line data processing or electronic data transfer as an alternative. Combining computer and transmission technology (e.g., fiber optics) would enhance the data transmission process, providing several advantages over the use of diskette media. The alternative process presents enhancements which include speed of transmission, simultaneous receipt acknowledgement, elimination of special content packaging and mailing burdens, and reduced paper correspondence.

Regardless of the method of transmittal, we suggest using this opportunity to further streamline reporting requirements via schedule changes. Redefining and adding flexibility to the present report period restrictions could considerably ease reporting burdens and quantities of transmissions. Material delivery campaigns are defined by strict schedules for arrivals and departures. Reduction in reporting burden could be realized by replacing the present 10 day notification rule with a report required at the end of a defined campaign. For example, simultaneous one time summary transmission by the shipper and receiver for multiple fuel shipments would be a more efficient reporting practice than reporting each shipment individually. This would typically apply to cycle reload campaign, between a fuel fabricator and a utilization facility, consisting of scheduled shipments over a six to ten week period. Additional relief could be derived from changing the present bi-annual material balance reporting to annual, while maintaining continual on-site security and inventory controls as required.

DS10

APR 23 1993

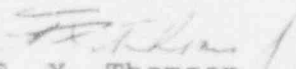
Secretary of the Commission -2-
NLR-N93062

Converting the 10 day notification rule to the end of a defined campaign would save many transmissions between fabricators, utilities and the agency. There would be no impact to safety or environment as the security of shipments is defined by strict schedules of arrival and or departures. Unapproved deviation from these schedules would initiate a reportability determination as a potential material diversion event, obviating the need for the ten day form notifications.

NUREG's BR-006 and BR-007 should be revised to conform with the proposed rule change. We also recommend changing the recordkeeping requirements associated with the affected reports. 10 CFR 74.33(d) specifically allows record storage on electronic media for special nuclear material accounting. Other recordkeeping regulations (10 CFR 40.61, 72.80, and 75.21 through 75.24) do not explicitly allow storage on electronic media, although the reporting regulations would require transfer of data via electronic media. Absent any conforming changes to record storage requirements, licensees would continue to be burdened with maintaining approved hardcopy of the reports, in addition to the new requirements imposed by the proposed rule. This would offset the stated benefit of burden reduction at NRC.

PSE&G appreciates the opportunity to comment on the proposed rule. If you would like to discuss any of these comments, please contact either Frank Fresella at (609) 339-1214 or Bill McTigue at (609) 339-1457.

Sincerely,


F. X. Thomson
Manager - Licensing
and Regulation

C R. H. Gramann
USNRC
Washington, DC 20555

Information and Records Management Branch
MNBB-7714
USNRC
Washington, DC 20555

Desk Officer
Office of Information and Regulatory Affairs (NEOB-3019)
Office of Management and Budget
Washington, DC 20503