



Station Support Department

62 FR 8785

Feb. 26, 1997

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USNRC

PECO Energy Company  
965 Chesterbrook Boulevard  
Wayne, PA 19087-5691

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May 22, 1997

Mr. David L. Meyer, Chief  
Rules Review and Directives Branch  
Division of Freedom of Information and  
Publication Services  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Mail Stop T6D59  
Washington, DC 20555-0001

Subject: Response to Request for Comments Concerning  
"Safety-Conscious Work Environment"  
(62FR8785, February 26, 1997)

Dear Mr. Meyer:

This letter is being submitted in response to the NRC's request for comments published in the Federal Register (i.e., 62FR8785, dated February 26, 1997) concerning the NRC's proposed strategies in addressing the need for licensees to establish and maintain a safety-conscious work environment. The NRC is considering the development of a standardized approach that would 1) require licensees to establish a safety-conscious work environment with clearly defined attributes; 2) establish certain indicators that may be monitored and that, when considered collectively, may provide evidence of an emerging adverse trend; and 3) outline specific remedial actions that the NRC may require when it determines that a particular licensee has failed to establish or maintain a safety-conscious work environment.

PECO Energy appreciates the opportunity to comment on the NRC's proposed strategies regarding the need for licensees to establish and maintain a safety-conscious work environment. PECO Energy is opposed to the adoption of a standardized regulatory approach for addressing nuclear work place issues. We do not consider it necessary to establish a regulation or policy statement to define the attributes of a safety-conscious work environment. PECO Energy believes that the industry already recognizes the importance and benefits of establishing and maintaining a safety-conscious work environment, and continually strives to improve in this area. Furthermore, PECO Energy fully supports the Nuclear Energy Institute's (NEI's) position and comments concerning this subject.

If you have any questions, please do not hesitate to contact.

Very truly yours,

*G. A. Hunger, Jr.*  
G. A. Hunger, Jr.  
Director - Licensing

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