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March 10, 2000

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Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

DOCKET NUMBER

PETITION RULE PRM 26-2
(64FR67202)

Attention: Rulemakings and Adjudications Staff

ULNRC-04202



DOCKET NUMBER 50-483
CALLAWAY PLANT
UNION ELECTRIC COMPANY
COMMENTS ON PETITION
FOR RULEMAKING TO ADDRESS FATIGUE
Reference: 64 Federal Register 230, December 1, 1999

AmerenUE is providing written comments on the above referenced petition for rulemaking to address fatigue. AmerenUE supports the position endorsed by the Nuclear Energy Institute and provides the following comments.

AmerenUE has developed internal procedures and processes to control and limit working hours in accordance with the guidelines specified in Generic Letter 82-12. AmerenUE believes the limitations and guidelines provided in Generic Letter 82-12 are sufficient to ensure no undue risk to operator fatigue. Furthermore, the proposed rule contains limitations which would be resource intensive to monitor and enforce with little or no real benefit. Therefore AmerenUE does not believe further rulemaking to address this issue is warranted or necessary.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan C. Passwater".

Alan C. Passwater
Manager, Corporate Nuclear Services

DJW/jdg

cc: Mr. David Desaulniers, Project Manager, NRC
Mr. Jim Davis, NEI