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6400 North Dixie Hwy., Newport, MI 48166

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OFFICE OF THE
GENERAL
COUNSEL
ADJUDICATIONS DIVISION

March 27, 2000
NRC-00-0007

DOCKET NUMBER

PETITION RULE PRM 50-68
(65FR1829)

Secretary
U. S. Nuclear Regulatory Commission
Attention: Rulemakings and Adjudications Staff
Washington D C 20555-0001

Reference: Petition for Rulemaking
Federal Register Notice (65FR1829),
dated January 12, 2000

Subject: Response to Request for Public Comments on Petition
For Rulemaking Filed by Mr. Bob Christie regarding
Hydrogen Control Systems at Nuclear Power Plants

Detroit Edison, owner and operator of the Fermi 2 Nuclear Power Plant, wishes to comment on the petition for rulemaking filed by Mr. Bob Christie concerning amending requirements for hydrogen control systems at nuclear power plants based on severe accident risk insights.

We support Mr. Christie's proposal that 10CFR50.44 be revised to generically reflect the insights from the licensing actions taken at San Onofre regarding combustible gas control systems to other plants and other containment types. We believe that analytical and risk bases exist to support the proposed rule change for Mark I Boiling Water Reactor (BWR) containments.

We believe this to be a good example for utilizing risk-informed conclusions to enhance technical requirements. In addition to cost savings, the proposed rulemaking would provide substantial benefits to utilities by allowing operations, maintenance, engineering and testing resources to focus further on more risk significant systems and issues.

Should you have any questions or require additional information, please contact me at (734) 586-4258.

Sincerely,

Norman K. Peterson
Director - Nuclear Licensing