



**PECO ENERGY**

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

April 24, 2000

OFFICE OF  
PUBLIC  
ADJUDICATION

Secretary  
U.S. Nuclear Regulatory Commission  
Attn: Rulemakings and Adjudications Staff  
Washington, DC 20555-0001

**DOCKET NUMBER**  
**PETITION RULE PRM 50-69**  
**(65FR6044)**

**Subject:** Petition for Rulemaking Regarding 10 CFR 50 Appendix G, Fracture Toughness Requirements.

This letter is being submitted in response to the NRC's request for comments concerning the Petition for Rulemaking Regarding 10 CFR 50 Appendix G, Fracture Toughness Requirements submitted by Westinghouse Electric Company LLC. The petition will revise Table 1 in 10 CFR Part 50 Appendix G, by removing footnotes 2 and 6 from the table. The amendments to the table would eliminate requirements for the metal temperature of the closure head flange and vessel flange regions. The petitioner believes the elimination of the flange requirements have no impact on Boiling Water Reactors (BWRs) and could improve plant safety in Pressurized Water Reactors (PWRs).

PECO Energy appreciates the opportunity to comment on the petition for rulemaking. PECO Energy supports the comments submitted on behalf of the nuclear energy industry, by the Nuclear Energy Institute.

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

Very truly yours,

James A. Hutton, Jr.  
Director - Licensing