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Rules and Directives Branch  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: Comments on Draft Regulatory Guide DG-1075, "Emergency Planning and Preparedness for Nuclear Power Reactors"

- References: (1) Volume 65, Federal Register, Page 15397 (65 FR 15397), dated March 22, 2000
- (2) Draft Guide (DG) - 1075, "Emergency Planning and Preparedness for Nuclear Power Reactors," dated March 2000

This letter is in response to Reference 1 and provides Commonwealth Edison (ComEd) Company comments on Reference 2. We endorse Reference 2 which recognizes Nuclear Energy Institute (NEI) document 99-01, "Methodology for Development of Emergency Action Levels," Revision 4, February 2000, as an acceptable alternative approach to NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," Revision 1, Appendix A, "Basis for Emergency Action Levels for Nuclear Facilities."

NEI 99-01 provides a basis to revise and enhance the guidance of Regulatory Guide (RG) 1.101, "Emergency Planning and Preparedness for Nuclear Power Reactors," Revision 3, by incorporating industry and NRC lessons learned since the RG's implementation. It consolidates the system malfunction initiating conditions and example emergency action levels which address conditions that may be postulated to occur at nuclear power plants during plant shutdown conditions. Also included are initiating conditions and example emergency action levels that fully address conditions that may be postulated to occur at permanently defueled nuclear stations and independent spent fuel storage installations.

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E-RIDS = ADM-03  
~~Add: J. Birmingham~~ (JLB4)  
ADD: RANDY SULLIVAN

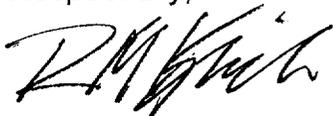
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Recognition Categories C, D, and E initiating conditions and associated emergency action levels were written so that they could be implemented by both NUMARC/NESP-007, "Methodology for Development for Emergency Action Levels," and NUREG-0654/FEMA-REP-1 users. In this regard, we concur that industry implementation of NEI 99-01 should be on a voluntary basis.

We actively participated in the development of NEI 99-01 and in the subsequent review process with the NRC. We consider the detailed interaction between the industry and the NRC has resulted in the development of an emergency action levels system which more effectively addresses conditions that may be postulated to occur at nuclear power plants. As a member of the NEI Emergency Action Level Issue Task Force, we are prepared to review comments provided to the NRC by the public and modify NEI 99-01 if found necessary.

We appreciate the opportunity to comment on the draft regulatory guide. If there are any questions, please contact Mr. Martin Vonk, Emergency Preparedness Manager at (630) 663-6535.

Respectfully,

A handwritten signature in black ink, appearing to read 'R. M. Krich', written in a cursive style.

R. M. Krich  
Vice President – Regulatory Services