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WOLF CREEK
NUCLEAR OPERATING CORPORATION

Otto L. Maynard
President and Chief Executive Officer

JUN 8 2000

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Mr. David L. Meyer
Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
Mail Stop: T-6 D59,
U. S. Nuclear Regulatory Commission
Washington, D.C., 20555-0001

Reference: Federal Register Notice, 65 FR 24231, dated
April 25, 2000
Subject: Comments on Draft Regulatory Guide, DG-109,
"Guidance for Implementation of 10 CFR 50.59,
Changes, Tests and Experiments"

Dear Mr. Meyer:

As noted in the referenced Federal Register Notice, the NRC published a new guide in the Regulatory Guide Series to describe methods acceptable to the NRC for complying with the NRC's revised regulation for evaluating changes, tests, and experiments that a licensee wishes to make without prior NRC approval. The regulatory guide will endorse the Nuclear Energy Institute (NEI) guidance on 10 CFR 50.59. That same notice also solicited comments from the public.

Wolf Creek Nuclear Operating Corporation (WCNOC) endorses the comments submitted by the NEI on this issue, and believes that incorporating these comments into the guidance would provide substantial improvement to both the process and its implementation. WCNOC, along with the industry, will look forward to final issuance of the regulatory guide and the NEI guidance.

If you should have any questions regarding this submittal, please contact me at (316) 364-4000, or Mr. Tony Harris at (316) 364-4038.

Very truly yours,



Otto L. Maynard

OLM/rlr

cc: J. N. Donohew (NRC)
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