

Union Electric

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RULES & DIR. BRANCH
US NRC

May 31, 2000

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65FR# 19030
10 Apr 00
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Mr. David L. Meyer
Chief, Rules and Directives Branch
Division of Administrative Services
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001



Dear Mr. Meyer:

ULNRC-04259

**PROPOSED NEW APPENDIX TO STANDARD
REVIEW PLAN (NUREG-0800), CHAPTER 19,
"USE OF PROBABILISTIC RISK ASSESSMENT IN
PLANT-SPECIFIC, RISK INFORMED
DECISIONMAKING: GENERAL GUIDANCE"
(65 FED. REG. 19030, APRIL 10, 2000)**

Ref: Letter from Stephen D. Floyd to you dated May 26, 2000, same subject.

AmerenUE has reviewed the proposed change to Standard Review Plan (SRP) Chapter 19 and endorses the comments submitted by Mr. Floyd. We recognize the need to consider risk insights for non risk informed amendment requests in rare cases, but believe the industry, NRC and the public will be best served by assuming that the SRP guidance is clear and unambiguous. There should also be consideration by the Commission before invoking this provision of the SRP.

Thank you for your consideration of these comments.

A. C. Passwater

ACP/mlo

cc: ACP Chrono

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