



PECO NUCLEAR

A Unit of PECO Energy

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May 25, 2000

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

Attn: David L. Meyer

Subject: Comments Concerning the Proposed New Appendix to Standard Review Plan (NUREG-0800), Chapter 19, "Use of Probabilistic Risk Assessment in Plant-Specific, Risk-Informed Decisionmaking: General Guidance" (65FR19030, dated April 10, 2000)

This letter is being submitted in response to the NRC's request for comments concerning Proposed New Appendix to Standard Review Plan (NUREG-0800), Chapter 19, "Use of Probabilistic Risk Assessment in Plant-Specific, Risk-Informed Decisionmaking: General Guidance," which was published in the federal register (65FR19030, dated April 10, 2000). The NRC has proposed a new appendix titled "Appendix D - Use of Risk Information in Review of Non-Risk Informed License Amendment Requests" to Chapter 19 of its Standard Review Plan (NUREG-0800). The appendix is being developed to provide guidance to the NRC staff on the use of risk information in those rare instances where license amendment requests appear to meet regulatory requirements but raise significant risk concerns due to special circumstances associated with the request.

PECO Energy appreciates the opportunity to comment on the proposed new appendix. 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

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ADD: R. Palla (RLP3)

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