



PECO NUCLEAR

A Unit of PECO Energy

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

June 9, 2000

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

Subject: Comments Concerning Draft Guide DG-1095 "Guidance for Implementation of 10 CFR 50.59, Changes, Tests and Experiments." (65FR24231, dated April 25, 2000)

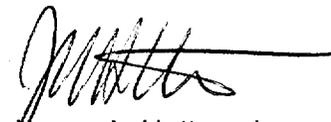
Dear Sir/Madam:

This letter is being submitted in response to the Nuclear Regulatory Commission's (NRC) request for comments concerning Draft Guide DG-1095 "Guidance for Implementation of 10 CFR 50.59, Changes, Tests and Experiments," which was published in the Federal Register (i.e., 65FR24231, dated April 25, 2000). The guide is being developed to describe methods acceptable to the NRC staff for complying with the NRC's regulations with regard to the process for evaluating changes, tests, and experiments that a licensee wishes to make without prior NRC approval. The guide proposes to endorse, with some clarifications, a Nuclear Energy Institute (NEI) document, Revision 1 of NEI 96-07, "Guidelines for 10 CFR 50.59 Evaluations."

PECO Energy appreciates the opportunity to comment on Draft Guide DG-1095 "Guidance for Implementation of 10 CFR 50.59, Changes, Tests and Experiments." PECO Energy endorses the comments on DG-1095 being provided through NEI.

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

Sincerely,


James A. Hutton, Jr.
Director - Licensing

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ADD: E McKenna (EMM)