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RS-00-13

May 31, 2000

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

Subject: Response to Request for Comments on New Appendix to Standard Review Plan (NUREG-0800), Chapter 19, "Use of Probabilistic Risk Assessment in Plant-Specific, Risk-Informed Decisionmaking: General Guidance"

References: (1) Volume 65, Federal Register, Page 19030 (65 FR 19030), dated April 10, 2000.
(2) Letter from Stephen D. Floyd, Nuclear Energy Institute to U. S. NRC, "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. 190303, April 10, 2000)," dated May 26, 2000.

We appreciate the opportunity to comment on the NRC's proposed New Appendix to Standard Review Plan (SRP), Chapter 19, and this letter provides Commonwealth Edison Company (ComEd) comments in response to Reference 1. ComEd has been engaged with the Nuclear Energy Institute (NEI) Working Group on this issue and fully endorses the industry comments submitted by the NEI in Reference 2.

In addition to the comments provided in Reference 2, we consider that the examples of special circumstances given in the Appendix (e.g., severe accident features, use of digital controls, steam generator tube criteria, hardened vents) are inappropriate because they do not represent cases in which adequate protection of safety does not already exist.

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E-RIDS = ADM-03
ADD: Robert Palla
(RLP3)

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If you have any questions or require additional information please contact me
at (630) 663-7330.

Respectfully,



for R. M. Krich
Vice President - Regulatory Services