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Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

July 25, 2000

Ms. Annette Vietti-Cook  
Secretary of the Commission  
ATTN: Rulemakings and Adjudications Staff  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

DOCKET NUMBER  
PETITION RULE PRM 50-71  
(65FR34599)

Dear Ms. Vietti-Cook:

NUCLEAR REGULATORY COMMISSION (NRC) - PETITION FOR RULEMAKING BY NUCLEAR ENERGY INSTITUTE (NEI) TO AMEND NRC REGULATIONS TO ALLOW USE OF ZIRCONIUM-BASED CLADDING MATERIALS OTHER THAN ZIRCALOY OR ZIRLO (*Volume 65 Federal Register 34599*)

TVA offers the following comments relative to a *Federal Register* notice that solicited public comments on the NEI petition for rulemaking to revise 10 CFR 50, §§44 and 46, to allow use of zirconium-based cladding materials other than zircaloy or ZIRLO in commercial nuclear power plants.

TVA supports the technical bases and conclusions drawn in the proposed rule change. We recommend that the NRC revise §§50.44 and 46 as described in the petition. In addition, we endorse comments made by NEI on this petition. If you have any questions, please contact Rob Brown at (423) 751-7228.

Sincerely,

*Mark J. Burzynski*  
Mark J. Burzynski  
Manager  
Nuclear Licensing

cc: U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
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