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**SIEMENS**

DOCKET NUMBER

PETITION RULE PRM 50-71

(65FR34599)

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July 31, 2000  
NRC:00:036

Secretary, U. S. Nuclear Regulatory Commission  
ATTN: Rulemakings and Adjudications Staff  
Washington, DC 20555-0001

AD

**Petition for Rulemaking, Docket PRM-50-71**

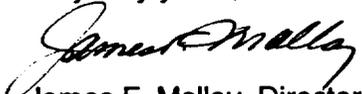
A notice of receipt of a petition for rulemaking submitted by the Nuclear Energy Institute was posted in the Federal Register of May 31, 2000 (65 FR 34599). This notice requested public comment on a petition for rulemaking to allow use of zirconium-based cladding materials other than zircaloy or ZIRLO.

Siemens Power Corporation agrees with the petitioner that the proposed rulemaking would improve the efficiency of the regulatory process by eliminating the need for individual licensees to obtain exemptions for the use of advance cladding materials that have been found acceptable by the NRC.

SPC urges the adoption of the proposed rule changes detailed in the notice. In addition, SPC agrees with the suggested revision of the wording in 50.46(e) proposed by the Nuclear Energy Institute in its comments on this same notice, and it should be incorporated.

SPC requests that the NRC promptly notice the proposed rulemaking. Because of its immediate benefit to licensees and the expectation that technically-based, adverse comments will not be received, serious consideration should be given to promulgation of the proposed change as a direct final rule.

Very truly yours,

  
James F. Mallay, Director  
Regulatory Affairs

/am

cc: David J. Modeen, NEI

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Template = SECY-067

SECY-02