

Commonwealth Edison Company
1400 Opus Place
Downers Grove, IL 60515-5701

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August 10, 2000

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

Subject: Response to Request for Comments on Draft Regulatory Guide DG-1097,
"Fire Protection For Operating Nuclear Plants"

- References: (1) Volume 65, Federal Register, Page 38866 (65 FR 38866), dated
June 22, 2000
- (2) Nuclear Energy Institute letter, "Industry Comments on Draft
Regulatory Guide-1097, 'Fire Protection For Operating Nuclear
Plants,'" dated August 10, 2000

Commonwealth Edison (ComEd) Company appreciates the opportunity to comment on the NRC's proposed draft Regulatory Guide DG-1097, "Fire Protection For Operating Nuclear Plants." This letter provides our comments in response to Reference 1. ComEd has been actively involved with the Nuclear Energy Institute (NEI) on this issue and fully endorses the industry comments submitted by the NEI in Reference 2. This regulatory guide can be an important tool in clarifying regulatory guidance and assisting licensees in complying with current regulations. However, ComEd is concerned that this "best practices" document in the form of a Regulatory Guide could easily become the standard by which current plants are judged, especially in specific areas of fire protection programs not currently addressed by plants, even if they do not explicitly commit to the new guidance.

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

Respectfully,



R. M. Krich
Vice President - Regulatory Services

TEMPLATE: ADM-03

E-RIDS = ADM-03
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