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(65 FR 42305)

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September 25, 2000

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

Subject: Comments Concerning Union of Concerned Scientists Petition for
Rulemaking (65FR42305, dated July 10, 2000)

Dear Sir:

This letter is being submitted in response to the NRC's request for comments concerning Union of Concerned Scientists Petition for Rulemaking which was published in the Federal Register (i.e., 65FR42305, dated July 10, 2000). The petitioner requests that the NRC regulations governing requirements for renewal of operating licenses for nuclear power plants be amended to address potential concerns about aging degradation of liquid and gaseous radioactive waste systems.

PECO Energy appreciates the opportunity to comment on this petition for rulemaking. We endorse the comments provided by the Nuclear Energy Institute. We believe that the liquid and gaseous radioactive waste systems are properly inspected and maintained such that the proposed revisions to 10CFR51 and 10CFR54 are unnecessary.

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

Very truly yours,

James A. Hutton, Jr.
Director - Licensing

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