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Union Electric

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(65FR42305)

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September 26, 2000

Ms. Annette Vietti-Cook
Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

AD



**NRC Request for Public Comments on the Union of Concerned Scientists
Petition of Rulemaking (65FR42305, July 10, 2000)**

Reference: NEI Letter from Anthony R. Pietrangelo, dated September 22, 2000

AmerenUE concurs with the comments presented in the referenced NEI comment letter. The request to amend the license renewal regulations should be denied based the following. The design and licensing of liquid and gaseous radwaste systems are very conservative and require analyses to demonstrate consistency with 10 CFR Part 100 guidelines and 10 CFR Part 20 guidelines. The radiological inventory in these systems is controlled and limited such that a postulated event or malfunction will not adversely impact public health or safety.

There is no safety benefit to including these systems within the scope of licensing renewal.

Sincerely,

David Stober
for Alan C. Passwater
Manager, Corporate Nuclear Services

DJW/mlo

- cc: B.F. Holderness
- D. E. Shafer
- D. J. Walker
- P. M. Bell
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- NEI File: E230.39

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