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(65 FR 50937)

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**PECO NUCLEAR**

A Unit of PECO Energy

Nuclear Group Headquarters  
200 Exelon Way  
Kennett Square, PA 19348

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October 3, 2000

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

Subject: Comments Concerning the Use of the Licensing Support Network for the Licensing Proceeding on the Disposal of High-Level Waste at a Geological Repository (65FR50937-40945, dated August 22, 2000)

Dear Sir/Madam:

This letter is being submitted in response to the Nuclear Regulatory Commission's (NRC) request for comments concerning the proposal to amend its Rules of Practice regarding the use of the Licensing Support Network (LSN) for the licensing proceeding on the disposal of high-level waste (HLW) at a geological repository. The proposed rule was published in the Federal Register on August 22, 2000 (65FR50937-50945). The proposed amendments would establish the basic data structure and design standards that LSN participant websites must use to make documentary material available. The proposed amendments would also clarify the authority of the LSN administrator to establish guidance for LSN participants, and would also clarify the timing of participant compliance certifications.

PECO Energy appreciates the opportunity to comment on the proposed rule and offers the following comments for consideration by the NRC:

In section IV of the proposed rule, paragraph (b)(2) details the requirements of formatting image files. The section ending "... or PDF (portable document format image) for compound documents." should read "... or PDF (portable document format image) normal for compound documents." PDF normal will ensure that the text of the compound document will be in a searchable format.

The proposed rule requires the waste repository to set up a web server in the public domain. This server will provide all of the documentation in a searchable format available to both the NRC and the public. The NRC will maintain an index of all of the information on the utility's server. The NRC is also requesting access to server logs in order to track information updates. The rule is not specific on which logs will require NRC access. If this rule is applied to members of the industry, PECO Energy requests that the NRC access be limited to content change logs.

WM-11

Template = SECY-067

SECY-02

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

Sincerely,

A handwritten signature in cursive script that reads "J. A. Hutton, Jr." with a horizontal line extending from the end of the signature.

James A. Hutton, Jr.  
Director - Licensing