

65 FR 53047

8-31-00

7

ComEd

RS-00-118

October 16, 2000

Chief, Rules and Directives Branch
Division of Administrative Services
U. S. Nuclear Regulatory Commission
Mail Stop T6-D69
Washington, D.C. 20555-0001

Rules and Directives
Branch
T6-D69
10/16/00 11:46
10/16/00

Subject: Response to Request for Comments on License Renewal Draft
Regulatory Guide and Draft Standard Review Plan

References: (1) Volume 65, Federal Register, Page 53047 (65 FR 53047), dated
August 31, 2000
(2) Nuclear Energy Institute letter, "NRC Request for Public Comments
on the Draft Guidance Documents for License Renewal (65FR53047,
August 31, 2000)," dated October 13, 2000

Commonwealth Edison (ComEd) Company appreciates the opportunity to comment on the NRC's proposed draft Regulatory Guide DG-1104, "Standard Format and Content for Applications To Renew Nuclear Power Plant Operating Licenses," draft Standard Review Plan for License Renewal (SRP-LR), "Standard Review Plan For the Review of License Renewal Applications for Nuclear Power Plants," and a draft Generic Aging Lessons Learned (GALL) Report. This letter provides ComEd's comments in response to Reference 1. ComEd has been actively involved with the Nuclear Energy Institute (NEI) on this issue and endorses the industry comments submitted by the NEI in Reference 2.

In addition to our support of NEI's comments, ComEd is concerned about how the GALL Report and the associated guidance for its use will treat plants that are not subject to the General Design Criteria (GDC) of 10 CFR Part 50, Appendix A, or the Standard Review Plan (NUREG-0800 SRP-LR). It is very likely that an applicant will reference, in whole or part, the report in its license renewal application. Thus, it is important that the GALL Report and its associated guidance recognize that differences exist in licensees' current licensing basis and provide flexibility to accommodate these differences.

ADM03

Template-ADM-013


ERIDS-03
Add. Raj Anand (RKA)
Steve Koenick (SSK2)

October 16 , 2000
Chief, Rules and Directives Branch
Page 2

As it stands now, the GALL Report and its associated guidance more frequently reference the most current version of codes, standards and other guidance. This may limit the usefulness of the GALL Report and its associated guidance for older plants, such as Dresden and Quad Cities. This is because some programs for these older plants do not incorporate all of the features subsequently required by the NRC for newer plants, and may not fully meet all ten of the criteria in the SRP-LR. Consequently, ComEd believes that the GALL Report and its associated guidance should clarify that aging management programs based on earlier versions of codes, standards and other guidance document are not excluded from use by these older plants. This flexibility could be incorporated by expanding the scope of the GALL Report to either include previously approved programs or to modify the acceptance criteria by which plants can certify that their programs are adequate for purposes of the GALL Report.

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

Respectfully,


 R. M. Krich
Vice President - Regulatory Services