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Nuclear Group Headquarters
 200 Exelon Way
 Kennett Square, PA 19348

Rules and Directives
 Branch
 USNRC

October 16, 2000

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

Subject: Comments on the Draft Guidance Documents for License Renewal
 (65FR53047, August 31, 2000)

Dear Sir:

This letter is being submitted in response to the NRC's request for comments concerning the following documents:

- 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, and
- A draft Generic Aging Lessons Learned (GALL) report

These documents describe methods acceptable to the NRC staff for implementing the license renewal rule (10CFR54) as well as techniques used by the NRC staff in evaluating applications for license renewals.

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 these guidance documents help focus on issues that are important to the individual plant seeking license renewal.

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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