CEOG COMBUSTION ENGINEERING OWNERS GROUP

CE Nuclear Power LLC
Arizona Public Service Co. Palo Verde 1, 2, 3
Baltimore Gas & Electric Calvert Cliffs 1, 2
Consumers Energy Co. Palisades
Entergy Operations, Inc. ANO 2 WSES Unit 3
Florida Power & Light Co. St. Lucie 1, 2
Korea Electric Power Corp. YGN 3, 4 Ulchin 3,4
Northeast Utilities Service Co. Millstone 2
Omaha Public Power District Ft. Calhoun
Southern California Edison SONGS 2,3

December 29, 2000
CEOG-00-344

NRC Project 692

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Subject: CEOG Comments Concerning ATWS Rule

Reference: F. Eltawila, NRC, to R. Phelps, CEOG, "Draft Report, Regulatory Effectiveness of the Anticipated Transient Without Scram Rule," October 18, 2000

Dear Mr. Eltawila:

The CEOG appreciates the opportunity to comment on the reference letter. Comments were invited in three areas; reasonableness of the ATWS approach, appropriateness of the ATWS conclusion, and related regulation and guidance documents that would enhance the effectiveness, efficiency and realism of NRC activities and decisions.

After review of the reference letter, the CEOG finds the basis for the ATWS rule reasonable. However, it is difficult to attribute to the ATWS rule the economic benefits achieved by extensive industry efforts to reduce plant trips and challenges to safety systems. The CEOG applauds staff efforts to improve the cost effectiveness of NRC activities and decisions, and welcomes opportunities to promote regulatory efficiency and realism.

Please do not hesitate to call me at 623-393-5882 or Gordon Bischoff, CEOG Project Office, at 860-285-5494 if you have any questions.

Sincerely,

Richard G. Bernier

Richard Bernier
Chairman, CE Owners Group

cc: J. Cushing (OWFN, 4D-7)
G. Bischoff (CEOG)
P. Leombruni (Windsor)
B. Bevilacqua, (Waltz Mill)
A. Drake (WOG)