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December 22, 2000

Rules and Directives Branch
 Office of Administration
 U. S. Nuclear Regulatory Commission
 Washington, D.C. 20555-0001

Subject: Response to Request for Comments on Draft Regulatory Guide, "Design, Inspection, and Testing Criteria for Air Filtration and Adsorption Units of Post Accident Engineered Safety Feature Atmosphere Cleanup Systems in Light Water Cooled Nuclear Power Plants (DG-1102)" and "Design, Inspection, and Testing Criteria for Air Filtration and Adsorption Units of Normal Ventilation Exhaust Systems in Light Water Cooled Nuclear Power Plants (DG-1103)"

References: (1) Volume 65, Federal Register, Page 65024 (65 Fed. Reg. 65024), dated October 31, 2000

(2) Nuclear Energy Institute letter, "Public Comment on Draft Regulatory Guides DG-1102 and DG-1103, (65 Fed. Reg. 65024)," dated December 22, 2000

Commonwealth Edison (ComEd) Company, appreciates the opportunity to comment on the NRC's proposed guidelines for complying with regulations on the design, inspection and testing criteria of air filtration and adsorption units of Post Accident Engineered Safety Feature Atmosphere Cleanup Systems, and Normal Ventilation Exhaust Systems, in light-water-reactor nuclear power plants. 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 fully endorses the industry comments submitted by the NEI in Reference 2.

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

Respectfully,



R. M. Krich
 Director - Licensing
 Mid-West Regional Operating Group

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 (AFB)