



## COMBUSTION ENGINEERING OWNERS GROUP

CE Nuclear Power LLC

Baltimore Gas & Electric  
Calvert Cliffs 1, 2

Entergy Operations, Inc.  
ANO 2 WSES Unit 3

Korea Electric Power Corp.  
YGN 3, 4 Ulsin 3,4

Omaha Public Power District  
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Arizona Public Service Co.  
Palo Verde 1, 2, 3

Consumers Energy Co.  
Palisades

Florida Power & Light Co.  
St. Lucie 1, 2

Northeast Utilities Service Co.  
Millstone 2

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 Bernier  
Chairman, CE Owners Group

cc: J. Cushing (OWFN, 4D-7)  
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P. Leombruni (Windsor)  
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DD47