



PECO NUCLEAR

A Unit of PECO Energy

Nuclear Group Headquarters
200 Exelon Way
Kennett Square, PA 19348

January 5, 2001

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

Ms. Brenda J. Shelton, Chief
Information and Records Management Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Request for Exception to 10CFR50.4, Written Communications

Dear Ms. Shelton:

This letter is being submitted to request an exception to the 10CFR50.4 requirement to provide printed copies in the form of "unglazed paper" when submitting and distributing applications for the renewal of the operating licenses for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3.

10CFR2, 10CFR50.4, and 10CFR50.30 provide the requirements for submitting and distributing copies of an application for license renewal. 10CFR51.55 contains similar requirements for the Environmental Report, which is required to support the application. Rather than submit and distribute copies on "unglazed paper", we seek approval to submit copies on compact disk (CD) medium as clarified below:

1. 10CFR50.4(b)(2)(ii) requires that an applicant submit one signed original and 37 copies to the Nuclear Regulatory Commission, Document Control Desk, one copy to the NRC Region I Office and one copy to the Resident NRC Inspector. We propose to submit the signed original and 40 CD copies to the Nuclear Regulatory Commission, Document Control Desk, one CD copy to the NRC Region I Office, and one CD copy to the Resident NRC Inspector.
2. 10 CFR51.55(a) requires that an applicant submit 41 copies of the Environmental Report to the Director of the Office of Nuclear Reactor Regulation. Since the Environmental Report will be included as an appendix to the License Renewal Application and the NRC's distribution requirements for the technical and

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environmental information may be different, we propose to meet this requirement through the submittal of the signed original (as indicated above in Item 1) and an additional 40 CD copies.

3. 10CFR2.101(a)(3)(ii) requires that an applicant submit one copy to the chief executive of the municipality or county in which the facility is located. We propose to submit one CD copy to the Chairman of the Board of Supervisors for Peach Bottom Township, one CD copy to the Chairman of the Board of Supervisors for Drumore Township, and one CD copy to the Chairman of the Board of Supervisors for Fulton Township, unless the recipient specifically requests that a paper copy be provided.
4. 10CFR2.101(a)(3)(iii) requires that an applicant make direct distribution of additional copies of the application to federal, state and local officials as instructed by the Director of NRR. 10CFR50.30(2) requires that 30 copies of the application be retained for that purpose. 10CFR51.55(a) requires that the applicant retain 109 copies of the Environmental Report for distribution to parties and Boards in the NRC proceedings; federal, state and local officials; and any affected Indian tribes as instructed by the Director of the Office of Nuclear Reactor Regulation. We propose to retain the application in the form of electronic files, which upon request, can be used to readily produce paper or CD copies of the application. However, we plan to provide only CD copies unless the recipient specifically requests that a paper copy be provided.

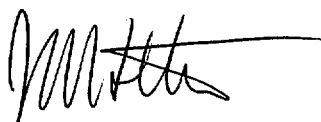
The CD versions of the facility's application will be in portable document format (PDF). Also included on each CD will be optional installation software that consists of Adobe Acrobat 4 Reader (to access the PDF files), and an ASCII text README file that provides installation information. PDF files on the CDs will be optimized to support internet/intranet byte serving without further processing.

Information on the CDs will not contain any material that is subject to copyright restrictions or information that is exempt from public disclosure. Adobe Acrobat Reader software includes an electronic end-user license agreement that allows unlimited reproduction and distribution of copies to other persons or entities provided the license agreement, copyright notices, and other proprietary notices appearing on or in the software are included with each copy.

The license renewal application for PBAPS is currently scheduled to be submitted in July 2001. To minimize our submittals in paper form, we request approval of this exception by April 1, 2001. If you have any questions regarding this request, please contact Mr. Jerry Phillabaum at (610) 765-5509.

Very truly yours,

PECO Energy Company



James A. Hutton, Jr.
Director - Licensing