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July 2, 2001

Chief, Rules and Directives Branch
U. S. Nuclear Regulatory Commission
Mail Stop T-06 D59
Washington, DC 20555-0001

Subject: Comments on Reducing Unnecessary Regulatory Burden While
Maintaining Safety

Reference: Volume 66, Federal Register, Page 22134 (66FR22134), dated
May 3, 2001

In 66FR22134, the NRC noticed a public workshop and requested comments on the subject of reducing unnecessary regulatory burden while maintaining safety. The public workshop was held on May 31, 2001, and written comments were requested by July 2, 2001. Exelon Generation Company (EGC), LLC participated in the workshop. This letter is a follow up to our comments provided during the workshop.

In June 2000, Commonwealth Edison Company, now EGC, developed a list of proposed reductions in unnecessary regulatory burden that were discussed with the NRC Office of Research on June 14, 2000. We also discussed several of those proposed reductions in unnecessary regulatory burden at the May 31, 2001, public workshop. In particular, we highlighted various reporting requirements from our list as a primary opportunity for reducing unnecessary regulatory burden.

We continue to consider the area of reporting requirements to be a primary opportunity for reducing unnecessary regulatory burden. Improvements in this area represent an initial step that could be accomplished by the NRC in the short term. EGC recommends the NRC use its existing mechanisms (e.g., direct final rulemaking) to eliminate regulations that impose reporting requirements, such as the ones identified on the list described above, that have little or no safety benefit.

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If you have any questions about this letter, please contact K. A. Ainger at (630) 657-2800.

Respectfully,

K. A. Ainger for

R. M. Krich
Director – Licensing
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