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OFFICE OF SECRETARY  
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ADJUDICATIONS STAFF

January 2, 2002

Annette L. Vietti-Cook  
Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Attention: Rulemakings and Adjudications Staff

Subject: Comments on NRC Proposed Draft 10 CFR 50.69, Risk-Informed Treatment of Structures, Systems and Components

Dear Ms. Vietti-Cook:

Nuclear Management Company (NMC), LLC appreciates the opportunity to comment on the NRC's proposed rule to add a 10 CFR 50.69 (ref. 66 Fed Reg. 59546, dated November 29, 2001). The goal of the proposed rulemaking is to permit power reactor licensees to implement an alternative framework with respect to the treatment requirements for structures, systems and components that is commensurate with their importance to safety. NMC, which operates the Duane Arnold Energy Center, Kewaunee Nuclear Power Plant, Monticello Nuclear Generating Plant, Palisades Nuclear Power Plant, Point Beach Nuclear Power Plant and Prairie Island Nuclear Generating Plant, supports the Commission's efforts in this regard.

NMC endorses NEI's comments on the proposed rule dated December 13, 2001. In particular, NMC urges the NRC to add §50.49 and §50.55a to the list of requirements that are not applicable to RISC-3 systems, structures, and components under §50.69. NMC believes maintaining these requirements for items of low safety significance adds burden that is not compensated for by a demonstrable safety benefit to the public, as is the intent of risk-informed regulation.

Sincerely,



Edward J. Weinkam  
Director, Regulatory Services