



Nuclear Management Company, LLC

22

August 28, 2003

**DOCKET NUMBER
PROPOSED RULE PR 50
(68FR 26511)**

DOCKETED
USNRC

September 3, 2003 (11:12AM)

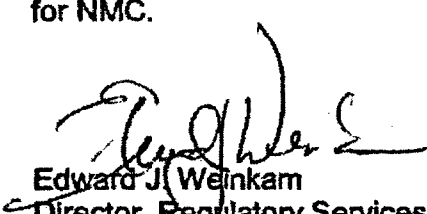
OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Attn: Rulemakings and Adjudications Staff
Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

COMMENTS ON NOTICE OF PROPOSED RULEMAKING FOR 10 CFR 50.69, RISK-INFORMED CATEGORIZATION AND TREATMENT OF STRUCTURES, SYSTEMS AND COMPONENTS FOR NUCLEAR POWER REACTORS (68 FEDERAL REGISTER 26511, MAY 16, 2003)

Nuclear Management Company (NMC), LLC* appreciates the opportunity to comment on the NRC's proposed rulemaking for 10 CFR 50.69, Risk-Informed Categorization And Treatment of Structures, Systems and Components for Nuclear Power Reactors (68 Federal Register 26511, May 16, 2003).

NMC shares the concerns expressed by the Nuclear Energy Institute in their comments dated August 22, 2003. To reiterate, the proposed rule language and statements of consideration would impose prescriptive requirements and expectations for the treatment of low risk significant components that are impractical, not risk-effective, or actually exceed current regulatory requirements. In addition, the Federal Register notice raises the question of whether a NRC reviewed full scope, all modes PRA should be a prerequisite for implementation of this rule. Such a requirement is neither technically necessary, nor feasible and would eliminate 10 CFR 50.69 as a viable option for NMC.


Edward J. Weinkam
Director, Regulatory Services
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* NMC is the licensed operator of the Duane Arnold Energy Center, Kewaunee Nuclear Power Plant, Monticello Nuclear Generating Plant, Palisades Nuclear Plant, Point Beach Nuclear Plant Units 1 and 2, and Prairie Island Nuclear Generating Plant Units 1 and 2.

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Template = SECY-067

SECY-02