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## Nuclear

Exelon Generation  
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RS-04-076

May 24, 2004

*4/29/04*  
*69 FR 23542*

Chief, Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
Mail Stop T-6-D59  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

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**Subject:** Comments on Model Safety Evaluation on Technical Specification Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process

**Reference:** Letter from B&W Owners Group to Dr. William D. Beckner (U.S. NRC), "Submittal of TSTF-369, Revision 1, 'Removal of Monthly Operating Report and Occupational Radiation Exposure Report,'" dated January 5, 2004

Exelon Generation Company, LLC (EGC) and AmerGen Energy Company, LLC (AmerGen) appreciate the opportunity to provide comments on the draft rule language for collection, reporting, or posting of information noticed in the Federal Register (FR) on April 29, 2004 (69 FR 23542). We fully support the changes proposed in the FR notice. EGC's and AmerGen's comments are provided below.

Monthly Operating Report (Standard Technical Specifications 5.6.4)

EGC and AmerGen consider that the draft rule language that proposes electronic reporting of Monthly Operating Report (MOR) data via an industry database in lieu of the currently required MOR letter will provide burden reduction and associated cost savings without an adverse impact on reactor safety or plant operation.

One enhancement to the proposed consolidated line item improvement process (CLIIP) that would be beneficial to the EGC and AmerGen fleet would be to incorporate a reference to Technical Specifications Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-258, Revision 4, "Changes to Section 5.0, Administrative Controls." TSTF-258, Revision 4, documented that it was acceptable to delete the requirement to provide documentation of all challenges to the power operated relief valves or safety valves in the MOR. Currently all EGC and AmerGen plants have this requirement specifically stated in the Administrative Section of Technical Specifications (TS). To delete the MOR completely from all EGC and AmerGen plant TS would require separate justification referencing TSTF-258. This could be accomplished by reference in the proposed CLIIP.

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*Att = W. Reckley (WR)*

*Template = ADM-013*

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EGC and AmerGen consider that the proposed changes will reduce unnecessary regulatory burden and cost while maintaining an adequate level of protection of health and safety.

Please contact Alison Mackellar at 630 657-2817 regarding any questions about this letter.

Respectfully,

A handwritten signature in black ink that reads "Kenneth A. Ainger". The signature is written in a cursive style with a large initial 'K' and a long, sweeping tail on the 'g'.

Kenneth A. Ainger  
Manager – Licensing