

An Exelon Company
AmerGen Energy Company, LLC
4300 Winfield Road
Warrenville, IL 60555

www.exeloncorp.com

2005 JUN 21 PM 12: 15

Nuclear
Exelon Generation
4300 Winfield Road
Warrenville, IL 60555

RS-05-079

June 13, 2005

RECEIVED

4/12/05
70 FR 19125

11

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
Mail Stop T6-D59
U. S. Nuclear Regulatory Commission
Rockville, MD 20555-0001

Reference: Federal Register, Vol. 70, No. 69, dated April 12, 2005, at page 19125

Subject: Comments on Proposed Generic Communication; Grid Reliability and the Impact on Plant Risk and the Operability of Offsite Power

As requested in the referenced Federal Register Notice (FRN), Exelon Generation Company, LLC (Exelon) and AmerGen Energy Company, LLC (AmerGen) are submitting the following comments on the proposed generic letter (GL).

Exelon and AmerGen endorse the comments provided by the Nuclear Energy Institute (NEI) in a letter from NEI on this topic dated June 13, 2005. In addition, we wish to highlight the following comments.

Based on the recent nuclear industry initiatives to improve the nuclear plant interface with transmission organizations (TOs), Exelon and AmerGen do not believe the issuance of this proposed GL is required.

Industry initiatives include issuance of the Institute of Nuclear Power Operations (INPO) Significant Operating Experience Report (SOER) 99-1, "Loss of Grid - Addendum," which further defines industry expectations for the nuclear plant interface with the TO and which addresses issues similar to those discussed in the proposed GL. Nuclear plant operators have developed responses to this document and INPO will include review of these responses in station evaluations starting in June 2005. In addition, INPO has initiated a program of station switchyard and transformer reviews. These reviews are being conducted by INPO lead switchyard and transformer personnel augmented with industry peers from both the nuclear industry and TOs. These reviews are currently in progress and INPO is establishing a mechanism to share the results with all members.

The industry has also formed the NEI Grid Reliability Task Force. This task force has been active in establishing discussions between the nuclear industry and the North American Electric Reliability Council (NERC). The Grid Reliability Task Force has initiated a NERC Standard Authorization Request requesting development of a standard to establish the requirements for the interface between nuclear plants and TOs to ensure the special requirements of nuclear plants are addressed. NERC has formed a standards drafting team consisting of

*5/25/05 Review Complete
Template ADM-013*

*E-REDS = ADM-03
Oll = A. MARKIEY
(CAWM)*

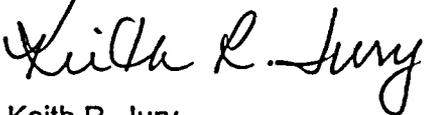
representatives from both nuclear and transmission organizations to develop the standard. This standard is scheduled for development and approval by the end of 2005.

The proposed GL makes reference to the August 14, 2003, power outage. The nuclear plant response to the power outage was as expected with emergency diesel generators functioning to maintain safe shutdown conditions. Significant corrective actions have been and continue to be put in place by TOs to address the direct and contributing causes to that event. These industry-wide corrective actions, including the development of new NERC standards for the planning and operation of the transmission grid, address overall grid reliability improvements and are targeted at the TOs responsible for grid reliability.

The nuclear industry initiatives to improve the nuclear plant interface with the transmission operators are consistent and compatible with the industry wide transmission industry initiatives. The proposed GL is not required to further these initiatives.

If you have any questions on this issue, please contact Mr. Allan R. Haeger at 630 657-2807.

Respectfully,



Keith R. Jury
Director, Licensing and Regulatory Affairs
Exelon Generation Company, LLC
AmerGen Energy Company, LLC