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**To:** <nrcprep@nrc.gov>  
**Date:** Fri, Dec 2, 2005 4:07 PM  
**Subject:** Comments on the Reactor Oversight Process

Submitted on behalf of Edward Weinkam.

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Nuclear Management Company, LLC

December 2, 2005

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Michael T. Lesar  
Chief, Rules and Directives Branch  
Office of Administration (Mail Stop T-6D59)  
U.S. Nuclear Regulatory Commission,  
Washington, DC 20555-0001

Solicitation of Comments on the Reactor Oversight Process  
(70 Federal Register 61318, October 21, 2005)

Nuclear Management Company (NMC), LLC\* appreciates the opportunity to comment on the implementation of the Reactor Oversight Process (ROP).

NMC wholly shares the views expressed by the Nuclear Energy Institute (NEI) in their comments dated November 30, 2005. In particular, NMC is concerned about the recent revision to the definition of Performance Deficiency in Manual Chapter 0612, as discussed by NEI's comments in response to Questions 5 and 9, and the potential for this new definition to circumvent the process for imposing plant-specific backfits pursuant to 10 CFR 50.109.

Edward J. Weinkam  
Director, Nuclear Licensing & Regulatory Services  
Nuclear Management Company, LLC

\* NMC is the licensed operator of the Duane Arnold Energy Center, 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.