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## Nuclear

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December 22, 2006

Rules and Directives Branch  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: Comments Concerning Draft Regulatory Guide DG-1134,  
*"Inservice Inspection Code Case Acceptability, ASME Section XI, Division I"*

Exelon Generation Company, LLC (Exelon) and AmerGen Energy Company, LLC (AmerGen) are submitting this letter in response to a request from the Nuclear Regulatory Commission (NRC) for comments concerning Draft Regulatory Guide DG-1134, *"Inservice Inspection Code Case Acceptability, ASME Section XI, Division I."* The NRC requested comments on DG-1134 by January 2, 2007.

DG-1134 contains proposed Revision 15 of Regulatory Guide 1.147, *"Inservice Inspection Code Case Acceptability, ASME Section XI, Division I,"* and identifies the Code Cases that have been determined by the NRC to be acceptable alternatives to applicable parts of Section XI.

Exelon and AmerGen appreciate the opportunity to comment on DG-1134, and offer the following comments for consideration by the NRC.

### General Comments

1. Section C, *"Regulatory Position,"* Subsection 2, *"Conditionally Acceptable Section XI Code Cases,"* Table 2.

There were significant changes in the conditions for use involving two (2) Code Cases that were not identified with revision shading. Specifically, the conditions for use for Code Cases N-533-1 and N-638-1 have changed considerably. DG-1134 (Section C, Subsection 1) states the following:

*"To assist users, new and revised Code Cases are shaded to distinguish them from those approved in previous versions of this guide. The shading will assist in focusing attention during the public comment period on the changes to the guide."*

In addition to new or revised Code Cases, we recommend that the NRC consider highlighting Code Cases in which there are changes in the conditions for use.

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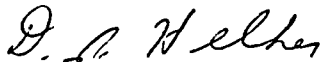
2. Section C, "Regulatory Position," Subsection 2, "Conditionally Acceptable Section XI Code Cases," Table 2.

The conditions for approval for both Code Case N-619 and N-648 state: "The provisions of Table IWB-2500-1, Examination Category B-D, continue to apply except that, in place of examination volumes, the surfaces to be examined are the external surfaces shown in the figures applicable to this table." It is our understanding that the reference to "external surfaces" refers to the surfaces on the inner radius of the nozzle. Therefore, we request that the NRC clarify the conditions for approval for both Code Case N-619 and N-648.

Code Case N-706, "Alternate Examination Requirements of Table IWB-2500-1 and Table IWC-2500-1 for PWR Stainless Steel Residual and Regenerative Heat Exchangers, Section XI Division 1," provides alternative examination requirements for Table IWB-2500-1, Examination Categories B-B, B-D and B-J, and Table IWC-2500-1, Examination Categories C-A, C-B, and C-F-1 in lieu of existing Section XI Code requirements. We recommend that the NRC consider including this Code Case in this revision (i.e., Revision 15) to Regulatory Guide 1.147. The NRC has recently approved a relief request using this Code Case.

If you have any questions or require additional information, please do not hesitate to contact Mr. Richard Gropp at 610-765-5557.

Sincerely,



David P. Helker  
Manager - Licensing