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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-1152,  
"Quality Group Classifications and Standards for Water-, Steam-, and  
Radioactive-Waste-Containing Components of Nuclear Power Plants"

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RULES AND DIRECTIVES  
USNRC

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-1152, "Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants." The NRC requested comments by December 23, 2006.

DG-1152 contains proposed Revision 4 of Regulatory Guide 1.26, "Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants," and describes a quality classification system related to specified national standards that may be used to determine quality standards acceptable to the NRC for satisfying General Design Criterion 1 for other safety-related components containing water, steam, or radioactive material in light-water-cooled nuclear power plants.

Exelon and AmerGen appreciate the opportunity to comment on DG-1152, and offer the following comments for consideration by the NRC.

Editorial Comments

1. Page 3, Section C, "Regulatory Position," Item (1), makes reference to 10CFR50.2(v). The regulations no longer refer to a paragraph (v) when defining reactor coolant pressure boundary. The definitions in the regulations are alphabetized and do not use this style format for listing the definitions. In addition, Item (1) makes reference to 10CFR50.55a footnote 2. Footnote 2 is currently "reserved," and therefore, it would be helpful to clarify this potential discrepancy. Perhaps these footnote references were used previously and have been subsequently deleted.
2. Page 3, Section C, "Regulatory Position," Item (1)(b), should make reference to footnote 5 and not 4.

E-RIDS = ADM-03

Call = J.B. Hixon (SEC)  
S.O'Connor (SEC)  
J. Redgely (JUR)  
J.T. Yerokun (ST)

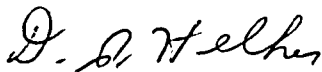
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3. Page 3, Section C, "*Regulatory Position*," Item (1)(e), should make reference to footnote 5 and not 4.
4. Page 4, Section C, "*Regulatory Position*," Item (2)(a), should make reference to footnote 5 and not 4.
5. Page 4, ,Section C, "*Regulatory Position*," Item (2)(b), should make reference to footnote 5 and not 4.
6. Page 4, Section C, "*Regulatory Position*," Item (2)(c), should make reference to footnote 5 and not 4.
7. Page 4, Section C, "*Regulatory Position*," Item (2)(d), should make reference to footnote 3 and not 2.
8. Page 8, "*Regulatory Analysis*," Section 4, "*Proposed Changes*," Item (4), should make reference to footnote 3 and not 2 in the final sentence.

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