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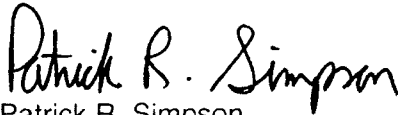
U. S. Nuclear Regulatory Commission
ATTN: Chief, Rules Review and Directives Branch
Mail Stop T6-D59
Washington, DC 20555-0001

Subject: Response to Request for Comments on Draft NUREG/BR-0006, "Instructions for Completing Nuclear Material Transaction Reports," Revision 7, and Draft NUREG/BR-0007, "Instructions for the Preparation and Distribution of Material Status Reports," Revision 6

Exelon Generation Company, LLC (EGC), appreciates the opportunity to comment on the NRC's draft NUREG/BR-0006, "Instructions for Completing Nuclear Material Transaction Reports," Revision 7, and draft NUREG/BR-0007, "Instructions for the Preparation and Distribution of Material Status Reports," Revision 6. EGC's comments on these two documents are provided in the attachment to this letter.

Should you have any questions concerning this letter, please contact Mr. Jeff Dunlap at (630) 657-2155.

Respectfully,



Patrick R. Simpson
Manager – Licensing

Attachment: Comments on Draft NUREG/BR-0006, "Instructions for Completing Nuclear Material Transaction Reports," Revision 7, and Draft NUREG/BR-0007, "Instructions for the Preparation and Distribution of Material Status Reports," Revision 6

SUNSI Review Complete
Template = ADM-013

E-REDS = ADM-03
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B. Horn (bgh1)

Attachment

Comments on Draft NUREG/BR-0006, "Instructions for Completing Nuclear Material Transaction Reports," Revision 7, and Draft NUREG/BR-0007, "Instructions for the Preparation and Distribution of Material Status Reports," Revision 6

1. Draft NUREG/BR-0006, "Instructions for Completing Nuclear Material Transaction Reports," Revision 7

Federal Register Volume 72, Number 24, dated February 6, 2007, includes proposed rules on regulatory improvements to the Nuclear Material Management and Safeguards System (NMMSS). Part II.G, "Reduction in Reporting Requirements for Export of Material Shipments," of the proposed rule states that NUREG/BR-0006 would be changed to reduce the reporting requirements for export of material shipments. Specifically, only the shipper information would be required to be submitted. Currently two separate forms are required to be sent by the shipper, one for the shipper and one for the receiver. This change does not appear to be incorporated in draft NUREG/BR-0006. The specific locations in draft NUREG/BR-0006 where this is addressed are on page 3, lines 28-30, page 9, lines 13-15, and page F-3, lines 42-45

2. Draft NUREG/BR-0007, "Instructions for the Preparation and Distribution of Material Status Reports," Revision 6

The two new items required for Section A of Form 742, "Process Code" and "Sequence Number," and the new item on Form 742C, "Process Code," are not addressed in NMMSS Report D-24, "Personal Computer Data Input for NRC Licensees." NMMSS Report D-24 should be revised in order for licensees to comply with this change to NUREG/BR-0007. The specific locations in draft NUREG/BR-0007 where this is addressed are Page 6, Lines 7-33, and Page 15, lines 10-32.