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December, 28, 2009

Mr. Michael T. Lesar
Chief, Rulemaking and Directives Branch (RDB)
Division of Administrative Services
Office of Administration
Mail Stop: TWB-05-BO1M
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-001

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12/01/09

74 FR 62829

(3)

Subject: Comments on Draft License Renewal Interim Staff Guidance LR-ISG-2009-01

The U.S. Nuclear Regulatory Commission (NRC) published a solicitation for public comment in the Federal Register on December 1, 2009 (74 FR 62829) concerning the subject draft License Renewal Interim Staff Guidance LR-ISG-2009-01, "Staff Guidance Regarding Plant-Specific Aging Management Program for the Neutron-Absorber Material in the Spent Fuel Pool Associated With License Renewal Applications."

Exelon Generation Company, LLC (EGC) has reviewed the draft ISG and requests the following clarifications be made to improve the readability and intent of the guidance. The comments below involve the Evaluation and Technical Basis section of the attachment entitled, "Monitoring of Neutron Absorbing Materials Other Than Boraflex."

- Item 4 (page 8): Please clarify the intent of the requirement to specify whether in-situ testing methods can be used in lieu of coupon measurements or if both are required in lieu of the alternate methods listed .
- Item 10 (page 9): The operating experience listed in this section includes the loss of neutron-absorbing capacity of the material at the Palisades plant. Please clarify that material for this example was Carborundum and not Boral.

If you have questions concerning this letter, please contact me at (630) 657-2823.

Respectfully,


Patrick R. Simpson
Manager – Licensing
Exelon Generation Company, LLC

SONSI Review Complete

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