

October 1, 2010

9/01/2010
75FR 53724

Ms. Cindy K. Bladey, Chief
Rules, Announcements and Directives Branch
Office of Administration
Mail Stop: TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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Subject: Comments Concerning Draft Division of Safety Systems Interim Staff Guidance DSS-ISG-2010-01, "Staff Guidance Regarding the Nuclear Criticality Safety Analysis for Spent Fuel Pools" (75FR53724, dated September 1, 2010, Docket ID NRC-2010-0289)

This letter is being submitted in response to the U.S. Nuclear Regulatory Commission (NRC) request for comments concerning draft Division of Safety Systems Interim Staff Guidance DSS-ISG-2010-01, "Staff Guidance Regarding the Nuclear Criticality Safety Analysis for Spent Fuel Pools," published in the *Federal Register* on September 1, 2010 (i.e., 75FR53724).

This draft ISG provides updated guidance to the NRC staff reviewers in order to address the increased complexity of recent Spent Fuel Pool (SFP) license application analyses and operations. The draft ISG is intended to reiterate existing guidance, clarify ambiguity in existing guidance, and identify lessons learned based on recent submittals.

Exelon Generation Company, LLC (Exelon) appreciates the opportunity to comment on this draft ISG. Exelon endorses and fully supports the comments submitted by the Nuclear Energy Institute (NEI) on behalf of the industry in its letter dated October 1, 2010.

If you have any questions or require additional information, please do not hesitate to contact me at (610) 765-5525.

Respectfully,

D. P. Helker

D. P. Helker
Manager - Licensing

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