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79FR13685

Ms. Cindy Bladey, Chief
Rules, Announcements, and Directives Branch (RADB)
Office of Administration
Mail Stop: 3WFN 06-44M
U.S. Nuclear Regulatory Commission
Attn: Rulemakings and Adjudications Staff
Washington, DC 20555-0001

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Subject: Comments on Draft Generic Letter, "Monitoring of Neutron-Absorbing Materials in Spent Fuel Pools" (79FR13685, dated March 11, 2014, Docket ID NRC-2014-0040)

This letter is being submitted in response to the U.S. Nuclear Regulatory Commission (NRC) request for comments published in the *Federal Register* on March 11, 2014 (i.e., 79FR13685) concerning draft Generic Letter (GL) "Monitoring of Neutron-Absorbing Materials in Spent Fuel Pools."

The NRC is issuing this draft GL to address degradation of neutron-absorbing materials in Spent Fuel Pools (SFPs). The NRC has determined that it is necessary to obtain plant-specific information requested in the draft GL in order for the NRC to determine if the degradation of the neutron-absorbing materials in SFPs is being managed to maintain reasonable assurance that the materials are capable of performing their intended safety function, and if the licensees are in compliance with the regulations.

Exelon Generation Company, LLC (Exelon) appreciates the opportunity to comment on this draft GL. Exelon believes that the estimate for completing the requested actions is considerably underestimated. In addition, Exelon fully supports the comments submitted by the Nuclear Energy Institute (NEI) on behalf of the industry related to this subject.

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

Respectfully,

David P. Helker
Manager, Licensing
Exelon Generation Company, LLC

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S. Krepel (stk1)