



Exelon Generation®

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September 23, 2015

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80 FR 44160
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Ms. Cindy Bladey
Office of Administration
Mail Stop: OWFN-12-H08
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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Subject: Comments on Draft Regulatory Issue Summary 2015-XX, "Clarification of 10 CFR 50.46 Reporting Requirements and Recent Issues with Related Guidance Not Approved for Use by the NRC" (Federal Register 80FR44160, dated July 24, 2015, Docket ID NRC-2015-0172)

This letter is being submitted in response to the U.S. Nuclear Regulatory Commission's (NRC's) request for comments concerning the subject draft Regulatory Issue Summary (RIS) 2015-XX, "Clarification of 10 CFR 50.46 Reporting Requirements and Recent Issues with Related Guidance Not Approved for Use by the NRC," published in the *Federal Register* (i.e., 80FR44160, dated July 24, 2015).

The NRC is issuing this draft RIS to clarify the reporting requirements under 10 CFR 50.46, "Acceptance criteria for emergency core cooling systems for light-water nuclear power reactors." Specifically, 10 CFR 50.46(a)(3) requires licensees to report to the NRC each change to, or error discovered in an acceptable Emergency Core Cooling System (ECCS) evaluation model, or in its application, and its estimated effect on the limiting ECCS analysis.

Exelon Generation Company, LLC (Exelon) appreciates the opportunity to comment on the draft RIS. Exelon supports the comments submitted by the Nuclear Energy Institute (NEI) on behalf of the industry related to the subject RIS.

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 and Regulatory Affairs
Exelon Generation Company, LLC

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