



Exelon Generation®

200 Exelon Way
Kennett Square, PA 19348

www.exeloncorp.com

February 10, 2016

Secretary
U.S. Nuclear Regulatory Commission
ATTN: Rulemakings and Adjudications Staff
Washington, DC 20555-0001

Subject: Comments Concerning Proposed Rule 10 CFR 50 and 52, "*Mitigation of Beyond-Design-Basis Events*" (80FR70610, dated November 13, 2015, Docket ID NRC-2014-0240)

This letter is being submitted in response to the U.S. Nuclear Regulatory Commission (NRC) request for comments concerning Proposed Rule 10 CFR 50 and 52, "*Mitigation of Beyond-Design-Basis Events*," published in the *Federal Register* (i.e., 80FR70610, dated November 13, 2015).

The NRC is proposing to amend its regulations that will establish regulatory requirements for nuclear power reactor applicants and licensees to mitigate beyond-design-basis events. The NRC is proposing to make generically applicable requirements in NRC Orders for mitigation of beyond-design-basis events and for reliable spent fuel pool instrumentation.

This Proposed Rule would establish regulatory requirements for an integrated response capability, including supporting requirements for command and control, drills, training and change control. This Proposed Rule also would establish requirements for enhanced onsite emergency response capabilities. Finally, this Proposed Rule would address a number of Petitions for Rulemaking (PRMs) submitted to the NRC following the March 2011 Fukushima Dai-ichi event. This rulemaking effort combines two NRC activities for which documents have been published in the *Federal Register* (i.e., Onsite Emergency Response Capabilities and Station Blackout Mitigation Strategies).

Exelon Generation Company, LLC (Exelon) appreciates the opportunity to comment on this subject. Exelon fully supports the comments submitted by the Nuclear Energy Institute (NEI) on behalf of the industry regarding this subject Proposed Rule.

If you have any questions or require additional information, please contact Richard Gropp at (610) 765-5557.

Respectfully,

David P. Helker
Manager, Licensing and Regulatory Affairs
Exelon Generation Company, LLC