



200 Exelon Way  
Kennett Square, PA 19348

[www.exeloncorp.com](http://www.exeloncorp.com)

March 21, 2016

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

Subject: Comments Concerning Petition for Rulemaking 10 CFR 50, "*Determining Which Structures, Systems, Components and Functions are Important to Safety*" (81FR410, dated January 6, 2016, Docket ID NRC-2015-0213)

This letter is being submitted in response to the U.S. Nuclear Regulatory Commission (NRC) request for comments concerning Petition for Rulemaking (PRM) 10 CFR 50, "*Determining Which Structures, Systems, Components and Functions are Important to Safety*," published in the *Federal Register* (i.e., 81FR410, dated January 6, 2016).

This PRM focuses on a request for the NRC to define the term "*important to safety*" and to provide a set of specific criteria for determining which Structures, Systems, and Components (SSCs) and functions are "*important to safety*." The NRC is examining the issues raised in this PRM to determine whether it should be considered in the rulemaking process and is soliciting public comments on this PRM.

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

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

Respectfully,

A handwritten signature in blue ink that reads "D. P. Helker".

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