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U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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81 FR 79056

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Subject: Comments Concerning Draft Interim Staff Guidance JLD-ISG-2012-01, Revision 2, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events." (81FR79056, dated November 10, 2016, Docket ID NRC-2012-0068)

This letter is being submitted in response to the U.S. Nuclear Regulatory Commission (NRC) request for comments concerning draft Revision 2 to Japan Lessons-Learned Division Interim Staff Guidance (JLD-ISG) JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," published in the *Federal Register* on November 10, 2016 (i.e., 81FR79056).

This ISG provides guidance and clarification to assist nuclear power reactor applicants and licensees with the identification of measures needed to comply with requirements to mitigate challenges to key safety functions. Draft Revision 2 to JLD-ISG-2012-01 is intended to provide further guidance and clarification when assessing the results of seismic hazard reevaluations with respect to the guidance and strategies required by Order EA-12-049.

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

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

SUNSI Review Complete
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