



Commonwealth Edison

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*PR - Issue Notice
Reg. Guide*

October 23, 1979



Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docketing and Service Branch

Subject: Draft Regulatory Guide-Division 1 Task FP 811-4,
September 1979 "Safety-Related Permanent Dewatering
Systems for Nuclear Power Plants".

Dear Sir,

Commonwealth Edison Company has reviewed the above
referenced Regulatory Guide and hereby submit the following
comment.

Comment: Item C.4a, C.4.b and C.4.c are too vaguely worded
to provide meaningful guidance. It is suggested
that the staff provide additional, specific guidance
including a discussion of the specific mechanisms of
concern and acceptable alternatives for use by designers.

If such guidance cannot be developed, the positions
should be deleted since they, as currently constituted,
invite the very kind of argumentative and subjective
interchange the regulatory guides are designed to fore-
stall.

We appreciate having been given the opportunity to comment.

Perry L. Barnes

Perry L. Barnes
Nuclear Licensing Dept.

Acknowledged by date 11/5/79

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