



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

DOCKET NUMBER
PROPOSED RULE PR 2, 50+54
(55FR29043)

DOCKETED
USNRC

87

October 12, 1990

'90 OCT 18 P3:45

Mr. Samuel J. Chilk, Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Docketing and Service Branch

Subject: Proposed Rule - 10 C.F.R. Parts 2, 50, & 54 Nuclear Power
Plant License Renewal Request For Comments

Dear Mr. Chilk:

Commonwealth Edison Company (CECo) appreciates the opportunity to provide comments on the referenced proposed rule regarding Nuclear Power Plant license renewal. The license renewal option will provide benefits to our customers through greater utilization of capital equipment and reduced reliance on fossil fuels. Commonwealth Edison, which owns and operates 6 Nuclear Power Plants (12 units) in northern Illinois, supports the Nuclear Regulatory Commission's efforts to make Nuclear Power Plant license renewal an option.

CECo has worked with the Nuclear Management and Resources Council (NUMARC) over the past several years to develop the assessment techniques and it's policy regarding plant license renewal. Therefore, CECo strongly supports the positions and comments on the License Renewal rule provided to the Commission by NUMARC in its letter of October 15, 1990.

In addition, CECo would like to emphasize several concerns with respect to the proposed rule:

1. The proposed rule as written relies heavily on the Statement of Considerations and the supporting NUREG documents. It is particularly important that sections of the rule be re-stated to clearly reflect the underlying assumptions and efforts made to develop the rule. It is imperative, to utilities contemplating the license renewal option, that the potential ambiguities are addressed at this stage of the decision-making process. CECo believes that the detailed comments drafted by the industry and submitted by NUMARC accomplish this objective.
2. The language dealing with the role of the current licensing basis (CLB) during the renewal term has been interpreted in differing ways. Section 54.29 Standards for Issuance of a Renewed License, has been interpreted to imply that the CLB would become a static catalog of license conditions for the renewal period. The proposed rule as written needs to clarify that the current licensing basis is in fact a continually developing body of requirements. CECo believes that the changes to this section proposed by NUMARC, better reflect the necessary focus of the CLB.

9010310069 901012
PDR PR
2 55FR29043 PDR

D510

October 12, 1990

3. The proposed rule does not explicitly contain a backfit provision or reference implementation of current 10 CFR 50.109 requirements. The position in the Statement of Considerations is that all age-related requirements which the staff believes are necessary to ensure adequate protection during the extended term, would be imposed without regard to cost. Under this proposed rule a new license would be issued for the renewal period and the remainder of the initial licensing period. This would imply that a modification (necessary to ensure adequate protection during the extended term) might be required without consideration of the backfit rule prior to the expiration of the first 40 years of plant life. CECO requests clarification on the status and timing of modifications that would be required for the extended period but not the original license period.
4. The revisions proposed for paragraph 54.21(a) regarding the scope and methodology to be employed for the integrated plant assessment are indispensable, if a stable and predictable process is to be realized. They improve the clarity and provide the necessary scope to assure that an adequate assessment of age-related degradation of plant structures, systems and components is completed. The screening methodology, which was submitted to the NRC for approval several months ago, should be adopted. We understand that the NRC is favorably considering this methodology, and we urge that it be named in the proposed rule as an acceptable assessment method and that in doing so, the present general language that appears to require a needless reexamination of the CLB, be eliminated.

Commonwealth Edison appreciates the opportunity to comment on the proposed rule for Nuclear Plant License Renewal.

Sincerely,


T. J. Kovach
Nuclear Licensing Manager

RL:tlm
ZNL0341