



PECO ENERGY

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USNRCPECO Energy Company
Nuclear Group Headquarters
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Mr. Samuel J. Chilk
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Attn: Docketing and Service Branch
Washington, DC 20555

Subject: PECO Energy Company
Comments Concerning Nuclear Regulatory Commission
Proposed Rule 10CFR50, "Codes and Standards for
Nuclear Power Plants; Subsection IWE and Subsection
IWL" (59FR979, dated January 7, 1994)

Dear Mr. Chilk:

This letter is being submitted in response to the NRC's request for comments concerning Proposed Rule 10CFR50, "Codes and Standards for Nuclear Power Plants; Subsection IWE and Subsection IWL," published in the Federal Register (i.e., 59FR979, dated January 7, 1994). PECO Energy Company appreciates the opportunity to comment on this proposed rule intended to amend the regulations (i.e., 10CFR50.55a) to incorporate by reference the 1992 Edition with the 1992 Addenda of Subsection IWE, "Requirements for Class MC and Metallic Liners of Class CC Components of Light-Water Cooled Power Plants," and Subsection IWL, "Requirements for Class CC Concrete Components of Light-Water Cooled Power Plants," of Section XI, Division 1, of the American Society of Mechanical Engineers (ASME), Boiler and Pressure Vessel (B&PV) Code. We would like to offer the following comments concerning this proposed rule for consideration by the NRC.

Comments

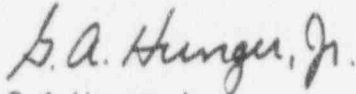
- 1) We recommend that the NRC reconsider endorsing Subsections IWE and IWL of Section XI of the ASME Code and imposing these examination requirements on Boiling Water Reactor (BWR) licensees at this time. The basis for this comment is that BWR Owners' Group has developed an extensive Model Containment Inspection Program for BWRs which will adequately address examinations for the primary containment when used in conjunction with other existing examination requirements (e.g., 10CFR50, Appendix J).
- 2) We recommend that the NRC reconsider the five (5) year expedited examination schedule stipulated in Section 50.55a(g)(6)(ii)(B) of the proposed rule. This schedule will be burdensome for plants operating on a 24-month refueling cycle, since most of the Subsection IWE examination requirements can only be performed from inside the primary containment, which will necessitate performing the required examinations during a refueling outage. As a result, the

proposed five (5) year implementation schedule will require licensees, operating on a 24-month refueling cycle, to complete all of the applicable examination requirements within two (2) refueling outages. Therefore, if the NRC continues with promulgation as a final rule, we recommend a longer implementation period (e.g., within the first three (3) refueling outages) than the one specified in this proposed rule.

In addition, we fully support the comments submitted by the BWR Owners' Group and Nuclear Energy Institute (NEI) concerning this proposed rule.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script that reads "G. A. Hunger, Jr.".

G. A. Hunger, Jr.
Director
Licensing Section