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PECO Energy Company
965 Chesterbrook Boulevard
Wayne, PA 19087-5691

November 10, 1999

OFFICE
OF
ADJUDICATIONS

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

DOCKET NUMBER
PROPOSED RULE **PR 20**
(64FR35090)

Subject: Comments Concerning "Release of Solid Materials at Licensed Facilities: Issues Paper, Scoping Process for Environmental Issues, and Notice of Public Meeting" (64FR35090, dated June 30, 1999)

Dear Sir:

This letter is being submitted in response to the NRC's request for comments concerning "Release of Solid Materials at Licensed Facilities: Issues Paper, Scoping Process for Environmental Issues, and Notice of Public Meeting" which was published in the Federal Register (i.e., 64FR35090, dated June 30, 1999). The NRC is considering a rulemaking that would set specific requirements on releases of solid materials in order to establish a regulatory framework more consistent with existing NRC requirements on air and liquid releases.

PECO Energy appreciates the opportunity to comment on the proposed rulemaking on "Release of Solid Materials at Licensed Facilities." We offer the following comments for consideration by the NRC.

Comments

1. PECO Energy supports the rulemaking for "Release of Solid Materials at Licensed Facilities"
2. With respect to acceptable dose levels regarding release of solid materials from licensed facilities for unrestricted use, PECO Energy recommends a dose of less than 1 mrem to be used as a free release limit. PECO Energy also recommends a second release criteria of 10 mrem, that would permit licensed facilities to store the solid materials, with a dose level of 10 mrem or less, onsite for decay in storage, or at some other facility specific to radioactive material storage.
3. PECO Energy believes the rulemaking should apply to a wider group of materials that would include metals (steel, aluminum, copper) as well as concrete, soil, sewage, and dried solids collected from oil interceptors and holding ponds.
4. With respect to contaminated areas described in section A.1.2 paragraph 3 "Material Used for Radioactive Service in the Facility, or Located in Contaminated Areas or in Areas Where Activation can Occur," there is a need for clarification of what the contaminated areas are and the criteria for determining if an area is contaminated.

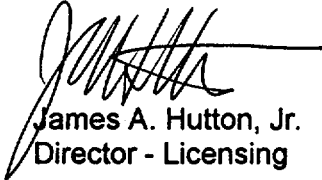
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If you have any questions, please do not hesitate to contact us.

Very truly yours,



James A. Hutton, Jr.
Director - Licensing

Attachments