



PECO ENERGY

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

November 15, 1999

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

DOCKET NUMBER

PETITION RULE PRM 51-7
(64FR48117)

Subject: Comments Concerning NEI's Petition for Rulemaking to Eliminate Analysis of Severe Accident Mitigation Alternative from License Renewal Reviews. (64FR48117, dated September 02, 1999)

Dear Sir:

This letter is being submitted in response to the NRC's request for comments concerning NEI's petition for rulemaking to eliminate analysis of Severe Accident Mitigation Alternative (SAMA) from license renewal reviews which was published in the Federal Register (i.e., 64FR48117, dated September 02, 1999). The NRC is considering rulemaking that would eliminate the requirement for the NRC to evaluate SAMA as part of its National Environmental Policy Act (NEPA) review associated with license renewal. The petitioner requests that the NRC take this action to achieve consistency in the scope of its regulatory requirements associated with NEPA and license renewal.

PECO Energy appreciates the opportunity to comment on the proposed rulemaking. We offer the following comment for consideration by the NRC.

Comment

PECO Energy Company supports the NEI petition for rulemaking and encourages the NRC to continue to expeditiously process the petition.

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

Very truly yours,

James A. Hutton, Jr.
Director - Licensing

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