



RECEIVED
PECO NUCLEAR

A Unit of PECO Energy

Rules and Directives
Branch
USNRC

65 FR 53047

8-31-00

(110)

Nuclear Group Headquarters
200 Exelon Way
Kennett Square, PA 19348

October 16, 2000

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

Subject: Comments on the Draft Guidance Documents for License Renewal
(65FR53047, August 31, 2000)

Dear Sir:

This letter is being submitted in response to the NRC's request for comments concerning the following documents:

- Draft Regulatory Guide DG-1104, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses"
- Draft Standard Review Plan for License Renewal, and
- A draft Generic Aging Lessons Learned (GALL) report

These documents describe methods acceptable to the NRC staff for implementing the license renewal rule (10CFR54) as well as techniques used by the NRC staff in evaluating applications for license renewals.

PECO Energy appreciates the opportunity to comment on this petition for rulemaking. We endorse the comments provided by the Nuclear Energy Institute. We believe that these guidance documents help focus on issues that are important to the individual plant seeking license renewal.

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

Very truly yours,

James A. Hutton, Jr.

James A. Hutton, Jr.
Director - Licensing

ERIDS 03

Add Steve Koenick

SSK2

Raj Anand

RKA

ADM03

Template ADM 013