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A Unit of PECO Energy

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USNRC

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December 15, 1999

OFFICE
OF
ADJUDICATION

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

DOCKET NUMBER
PROPOSED RULE PR 50
(64FR53270)

Subject: Comments Concerning "Emergency Core Cooling System Evaluation Models" (64FR53270, dated October 1, 1999)

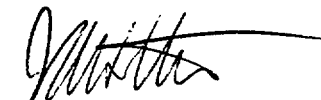
Dear Sir/Madam:

This letter is being submitted in response to the Nuclear Regulatory Commission's (NRC) request for comments concerning the proposed rule "Emergency Core Cooling System Evaluation Models" which was published in the Federal Register (i.e., 64FR53270, dated October 1, 1999). The NRC is proposing to amend its regulations to allow holders of operating licenses for nuclear power plants to reduce the assumed reactor power level used in evaluations of emergency core cooling systems (ECCS) performance. Under the proposed rule, licensees would be given the option to apply a reduced margin for ECCS evaluation or to maintain the value of reactor power currently mandated in the regulation. This action would allow licensees to pursue small, but cost beneficial, power uprates and would reduce unnecessary regulatory burden without compromising the margin of safety of the facility.

PECO Energy appreciates the opportunity to comment on the proposed rule "Emergency Core Cooling System Evaluation Models." PECO Energy supports the proposed rule, in light of the potential benefits to be derived from the proposed changes.

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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