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W. Scott

**PECO NUCLEAR**

A UNIT OF PECO ENERGY

Station Support Department

64FR 70098  
Dec. 15, 1999

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RULES & DIR. BRANCH  
US NRC

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

January 7, 2000

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Chief, Rules and Directives Branch,  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: Comments Concerning Draft Guide DG-1082 "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." (64FR70098, dated December 15, 1999)

Dear Sir/Madam:

This letter is being submitted in response to the Nuclear Regulatory Commission's (NRC) request for comments concerning Draft Guide DG-1082 "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants" which was published in the Federal Register (i.e., 64FR70098, dated December 15, 1999). The guide is being developed to propose guidance on implementing certain provisions of the NRC's Maintenance Rule by endorsing a revised Section 11 of an industry guideline, NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," which was prepared by the Nuclear Energy Institute.

PECO Energy appreciates the opportunity to comment on Draft Guide DG-1082 "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." PECO Energy supports the initiative to perform risk assessment prior to maintenance.

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

Very truly yours,

James A. Hutton, Jr.  
Director - Licensing

Attd. W. Scott