



**PECO NUCLEAR**

A UNIT OF PECO ENERGY

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J. O'Brien

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Station Support Department

64FR 66213

Nov. 24, 1999

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

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January 7, 2000

OFFICE OF SECRETARY  
RULEMAKING AND  
ADJUDICATIONS STAFF

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

Subject: Comments Concerning "Revised Criteria for Post Accident Sampling."  
(64FR66213, dated November 24, 1999)

Dear Sir/Madam:

This letter is being submitted in response to the NRC's request for comments concerning "Revised Criteria for Post Accident Sampling" (64FR66213, dated November 24, 1999). The NRC is considering modifying its criteria for post accident sampling systems (PASS). There are two industry-developed topical reports which provide justification for removal of PASS from the licensing basis for nuclear power plants designed by Westinghouse and Combustion Engineering. The NRC generally agrees with the conclusions in these reports and is considering approving the two reports. If the NRC approves the two reports, nuclear power plant licensees will be able to reference the reports to support changes to their PASS, including the elimination of the system.

PECO Energy appreciates the opportunity to comment on the "Revised Criteria for Post Accident Sampling." We offer the following comments for consideration by the NRC.

#### Comments

1. PECO Energy supports the removal of PASS from the licensing basis for nuclear power plants due to its marginal value in obtaining timely and reliable post accident fuel damage information.
2. PECO Energy does not believe PASS will provide information that may affect the ability of an offsite Emergency Response Organization to respond to an accident.