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Ms. Cindy Bladey
Office of Administration
Mail Stop: 3WFN 06A-A44M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments on Draft Regulatory Guide DG-1141, "Setpoints for Safety-Related Instruments" (*Federal Register* 79FR40163, dated July 11, 2014, Docket ID NRC-2014-0163)

This letter is being submitted in response to the U.S. Nuclear Regulatory Commission's (NRC's) request for comments concerning the subject draft Regulatory Guide DG-1141, "Setpoints for Safety-Related Instruments," published in the *Federal Register* (i.e., 79FR40163, dated July 11, 2014).

DG-1141 is proposed Revision 4 of Regulatory Guide 1.105, "Setpoints for Safety-Related Instrumentation." DG-1141 describes proposed practices and criteria that the NRC considers acceptable for demonstrating compliance with NRC requirements for ensuring that setpoints for safety-related instruments are initially within, and should remain within, Technical Specification (TS) limits. This DG also proposes practices and criteria for establishing those TS limits and ensuring that those limits will adequately support the proper operation of the associated systems.

Exelon Generation Company, LLC (Exelon) appreciates the opportunity to comment on the subject draft Regulatory Guide. Exelon fully supports the comments submitted by the International Society for Automation (ISA), the Nuclear Energy Institute (NEI), and General Electric - Hitachi (GEH) on behalf of the nuclear power industry related to DG-1141. Exelon also encourages the proposal for a working group of NRC, industry, and ISA representatives to collaborate on establishing a guideline that would be considered acceptable and beneficial to the NRC and the industry.

If you have any questions or require additional information, please do not hesitate to contact Richard Gropp at (610) 765-5557.

Respectfully,

James Barstow
Director, Licensing and Regulatory Affairs
Exelon Generation Company, LLC

SUNSI Review Complete

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