



Exelon Generation®

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September 5, 2014

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

Subject: Comments on Proposed Rule 10 CFR 50 and 52, "*Performance-Based Emergency Core Cooling Systems Cladding Acceptance Criteria*" (79FR16106, dated March 24, 2014, Docket ID NRC-2008-0332)

This letter is being submitted in response to the U.S. Nuclear Regulatory Commission's (NRC's) request for comments concerning the subject Proposed Rule 10 CFR 50 and 52, "*Performance-Based Emergency Core Cooling Systems Cladding Acceptance Criteria*," published in the *Federal Register* (i.e., 79FR16106, dated March 24, 2014).

The NRC is proposing to amend its regulations to revise the acceptance criteria for the Emergency Core Cooling System (ECCS) for light-water nuclear power reactors. The proposed ECCS acceptance criteria are performance-based, and reflect recent research findings that identified new embrittlement mechanisms for fuel rods with zirconium alloy cladding under Loss-of-Coolant Accident (LOCA) conditions. The proposed rule also addresses two Petitions for Rulemaking (PRMs) by establishing requirements applicable to all fuel types and cladding materials, and requiring the consideration of crud, oxide deposits, and hydrogen content in zirconium-based alloy fuel cladding. Further, the proposed rule contains a provision that would allow licensees to use an alternative risk-informed approach to evaluate the effects of debris for long-term cooling. The NRC is also seeking public comment on three draft regulatory guides that would support the implementation of the proposed rule.

Exelon Generation Company, LLC (Exelon) fully supports the comments submitted by the Nuclear Energy Institute (NEI) on behalf of the nuclear power industry related to this subject proposed rule. The NEI comments were prepared by the Electric Power Research Institute (EPRI) Fuel Reliability Program Regulatory Technical Advisory Committee in collaboration with the Pressurized Water Reactor (PWR) Owners Group and the Boiling Water Reactor (BWR) Owners Group.

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

Respectfully,

A handwritten signature in black ink that reads "James Barstow". The signature is written in a cursive, flowing style.

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