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Rules and Directives
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Chief, Rules and Directives Branch
Office of Administrative Services
U. S. Nuclear Regulatory Commission
Washington D.C. 20555-0001

65 FR 70742
11/27/00
(6)

Subject: Response to Request for Comments on Draft Regulatory Guide DG-1736,
"Consolidated Guidance: 10 CFR Part 20 - Standards for Protection Against
Radiation"

Reference: Volume 65, Federal Register, Page 70742 (65 FR 70742), dated November 27,
2000

Exelon Generation Company (EGC), LLC (Exelon), and AmerGen Energy Company, LLC (AmerGen) appreciate the opportunity to comment on the NRC's proposed framework for consolidating numerous guidance documents into a single source related to 10 CFR Part 20, "Standards for Protection Against Radiation." This letter provides Exelon's and AmerGen's comments in response to the Reference.

Section 3.20.1601, "Control of Access to High Radiation Areas," discusses guidance for control of access to high radiation areas. Regulatory Guide (RG) 8.38, "Control of Access to High and Very High Radiation Areas in Nuclear Power Plants," Section 2.4, "Alternative Methods for Access Control," describes a preapproved alternative method to the NRC requirements for the control of access to high radiation areas. This alternate method should be specifically referenced in the draft regulatory guide, preferably in the "Guidance Statement" section, (i.e., page 3-101).

If you have any questions or require additional information please contact me at
(630) 663-7330.

Respectfully,


R. M. Krich
Director - Licensing
Mid-West Regional Operating Group

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