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OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Ms. Annette L. Vietti-Cook  
Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

GL01-042

ATTN: Rulemakings and Adjudications Staff  
Mail Stop O-16C1

**REQUEST FOR COMMENTS ON A POSSIBLE AMENDMENT TO NRC  
REGULATIONS**

Dear Ms. Vietti-Cook,

Virginia Electric and Power Company (Dominion) appreciates the opportunity to provide comments on a possible amendment to NRC regulations to add 10 CFR 50.69, "Risk-Informed Treatment of Structures, Systems and Components," which appeared in the Federal Register, volume 66, number 230, page 59546, on November 29, 2001.

Dominion endorses the comments provided separately by the Nuclear Energy Institute (NEI) on behalf of the industry. Additionally, we have the following comment for your consideration on this proposed amendment. Dominion feels very strongly that the exclusion discussed below is necessary for the proposed rule to be of any benefit.

The draft 50.69(d)(3) rule language does not include an exclusion of special treatment requirements in 50.49, 50.55a, and Appendix A to Part 100 for RISC-3 or RISC-4 Structures, Systems and Components (SSCs). The industry has proposed, subject to NRC approval, alternate methods in NEI 00-04 to address the intent of these special treatment requirements for RISC-3 and RISC-4 SSCs. These alternate methods provide a level of assurance, commensurate with these SSC's safety significance, that design basis functions relating to equipment qualification, seismic and structural integrity are maintained. The failure to exclude these special treatment requirements from the scope of 50.69(d)(3) is a significant change from the original expectations of the Part 50 Option 2 effort. Without these exclusions, Dominion believes the implementation of this new proposed rule would not be cost-effective.

Template = SECY-067

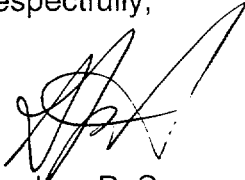
SECY-02

If you would like further information, please contact either:

Mr. Tom Hook      tom\_hook@dom.com, or (804) 273-2327 or

Mr. Don Olson      don\_olson@dom.com, or (804) 273-2830

Respectfully,

A handwritten signature in black ink, appearing to be 'SPS', written over a circular stamp or seal.

Stephen P. Sarver, Director  
Nuclear Licensing and Operations Support