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Serial: PE&RAS 03-101
August 25, 2003

Secretary
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Rulemakings and Adjudications Staff

Subject: Comments on Notice of Proposed Rulemaking for 10 CFR 50.69,
Risk-Informed Categorization and Treatment of Structures, Systems
and Components for Nuclear Power Reactors (68 FR 26511, May 16,
2003)
RIN 3150-AG42

Ladies and Gentlemen:

Progress Energy endorses the comments related to the subject Federal Register notice submitted by the Nuclear Energy Institute (NEI), by letter dated August 22, 2003.

- A major concern is that the rule language and statements of consideration (SOC) are inconsistent regarding the requirements for treatment and monitoring of plant structures, systems and components (SSCs) that are safety related and of low safety significance (RISC-3 SSCs).
- Another major concern is related to the requirement for a NRC reviewed, full scope, all modes PRA (probabilistic risk assessment), which should not be a prerequisite for implementation of this rule.

Progress Energy appreciates NRC staff's effort in developing the proposed rule and will consider implementation of 10 CFR 50.69, provided the industry comments are appropriately addressed in the final rule.

Please contact me at (919) 546-4579 if you have any questions.

Sincerely,

Tony Groblewski
Supervisor - Corporate
Regulatory Affairs

CMI

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(68FR 26511)

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