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U.S. Nuclear Regulatory Commission
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Subject: Comments Concerning Reactor Oversight Process Enhancement Initiative
(84FR38675, dated August 7, 2019, Docket ID NRC-2019-0155)

This letter is being submitted in response to the U.S. Nuclear Regulatory Commission's (NRC's) request for comments published in the *Federal Register* (i.e., 84FR38675) on its Reactor Oversight Process Enhancement (ROP) Initiative efforts.

The NRC is currently evaluating possible long-term ROP enhancements and is soliciting stakeholder comments related to what areas of the ROP are or are not working well. The NRC is also requesting comments on ways to improve the ROP in the areas of: 1) the Problem Identification and Resolution (PI&R) Inspection Program, 2) the cross-cutting issues process, 3) radiation protection inspection procedures, 4) the inspection program for Independent Spent Fuel Storage Installations (ISFSI), and 5) the Significance Determination Process (SDP), particularly for the emergency preparedness cornerstone.

Exelon Generation Company, LLC (Exelon) appreciates the opportunity to comment on the NRC's ROP enhancements efforts. The NRC's initiative has looked for opportunities to make the ROP more efficient, more safety focused, and more effective. Exelon is encouraged with the recommendations presented in SECY-19-0067, "*Recommendations for Enhancing the Reactor Oversight Process*," dated June 28, 2019, and considers the ROP a relatively sound process. However, Exelon believes that the NRC could do more to enhance the safety focus and efficiency of the ROP. To this end, Exelon supports the comments submitted by the Nuclear Energy Institute (NEI) on behalf of the industry related to the subject.

If you have any questions or require additional information, please contact me at (610) 765-5585.

Respectfully,



David T. Gudger
Sr. Manager, Licensing
Exelon Generation Company, LLC