



PECO NUCLEAR

A Unit of PECO Energy

DSO7
S. Hoffman

Station Support Department

61FR 43792

Aug. 26, 1996

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PECO Energy Company
965 Chesterbrook Boulevard
Wayne, PA 19087-5691

December 2, 1996

Mr. Carlton C. Kammerer, Director
Division of Freedom of Information and
Publications Services
Office of Administration
Attn: Document Control Desk
Washington, DC 20555

Subject: Comments Concerning Draft Regulatory Guide DG-1047,
"Standard Format and Content for Applications to
Renew Nuclear Power Plant Operating Licenses"

Dear Mr. Kammerer:

This letter is being submitted in response to the NRC's request for comments concerning draft Regulatory Guide (RG) DG-1047, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses." This draft RG was developed to provide a uniform format and content acceptable to the NRC for structuring and presenting the information to be submitted in an application for renewal of a nuclear power plant operating license.

PECO Energy appreciates the opportunity to comment on this draft RG. PECO Energy was one of the participating utilities in the joint Nuclear Energy Institute (NEI)/NRC License Renewal Demonstration Project, and for the last year has also been an active member of the NEI Task Force which developed NEI 95-10, "The License Renewal Rule." Also, we are an active member of the Boiling Water Reactor Owners' Group (BWROG) License Renewal Committee.

PECO Energy believes that a stable, efficient, and predictable license renewal process is essential to the viability of PECO Energy, and other utilities, in being able to obtain an additional 20 years of operating life for our nuclear power plants. The actions by the NRC, NEI, and several utilities over the past several years to revise 10 CFR Part 54 have been instrumental in improving the license renewal process. However, PECO Energy believes that the license renewal process has not evolved to a stable, efficient, and predictable state. PECO Energy also believes that a significant amount of work remains to reach this condition, and that this is achievable only with the continued cooperation of the NRC, NEI, and the nuclear power plant licensees.

Rather than provide specific comments on this draft RG, PECO Energy wishes to endorse the comments provided to the NRC by both NEI and the BWROG License Renewal Committee. PECO Energy was actively involved in the preparation of these comment documents, and believes that satisfactory resolution of the comments provided will lead to a license renewal

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IRP-11 - Guidelines
to NRC
XIRP-11 - Comments

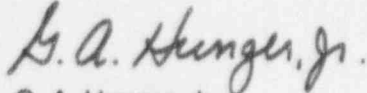
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process that will properly implement 10 CFR Part 54, and in so doing will provide a stable, efficient, and predictable process that will enable licensees to safely extend the operation of their nuclear power plants for an additional 20 years.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script that reads "G. A. Hunger, Jr.".

G. A. Hunger, Jr.
Director - Licensing