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April 26, 2000

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Secretary of the Commission U. S. Nuclear Regulatory Commission Washington, DC 20555-0001 PETITION RULE PRIM 50-69
(65FR6044)

Attention: Rulemaking and Adjudications Staff

ULNRC-04234



COMMENTS ON PETITION FOR RULEMAKING BY WESTINGHOUSE ELECTRIC COMPANY ON 10CFR50, APPENDIX G, FRACTURE TOUGHNESS REQUIREMENTS Federal Register 6044

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AmerenUE supports removal of footnotes 2 and 6 from Table 1 in 10 CFR Part 50, Appendix G. The result would be the elimination of requirements related to the metal temperature of the closure head flange and vessel flange regions of the reactor pressure vessel. AmerenUE provides this comment in accordance with its position and that of the Nuclear Energy Institute on behalf of the commercial nuclear industry. Although there is no immediate benefit to Callaway, future operations could result in this rule revision being a definite benefit. This communication of our comment on the petition for rulemaking contains no new licensing basis commitments regarding Callaway Plant.

Sincerely,

Alan C. Passwater

Manager, Corporate Nuclear Services

DJW/jdg