



# Utilities Service Alliance, Inc.

A Not-for-Profit, Membership Corporation  
Working Together For Mutual Success

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(11)

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June 9, 2000  
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Mr. David L. Meyer  
Chief, Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
Mail Stop: T-6 D59,  
U. S. Nuclear Regulatory Commission  
Washington, D.C., 20555-0001

Reference: Federal Register Notice, 65 FR 24231, dated  
April 25, 2000

Subject: **Comments on Draft Regulatory Guide, DG-1095, "Guidance  
for Implementation of 10 CFR 50.59, Changes, Tests and  
Experiments"**

Dear Mr. Meyer:

The Utilities Service Alliance (USA) appreciates the opportunity to comment on Draft Regulatory Guide, DG-1095. The guidance in NEI 96-07 is being used by the fourteen utilities participating in the USA 50.59 Project. The USA objective is to develop standardized procedures, forms, guidance and training programs. Endorsement of NEI 96-07 by this Regulatory Guide, therefore, is clearly a very important milestone in the implementation process.

The products described above that are being developed by USA will be revised as necessary to reflect changes resulting from comments on the Draft Regulatory Guide. As described at the NEI Licensing Issues Workshop in April, the USA developed procedures, forms and resource manual are being made available to all licensees via the NEI web site in order to promote consistent understanding and implementation of 10CFR50.59.

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Add: E-Mckenna (EMM)

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The Utilities Service Alliance (USA) endorses the comments submitted on this issue by NEI's letter dated June 8, 2000. USA believes that incorporating these comments into the guidance will provide important additional clarification and result in a significant improvement.

If you should have any questions regarding this submittal or the details of the USA Project described above, please contact me at (734) 586-4211.

Very truly yours,



Robert A. Newkirk  
Chairman,  
USA 50.59 Project

cc: Document Control Desk (USNRC)  
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