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August 20, 1999

Mr. Theodore S. Sherr
Chief, Regulatory and International Safeguards Branch
U.S. Nuclear Regulatory Commission
Two White Flint North 8A33
Washington, D.C. 20555

**Reference: Comments on the June, 1999 Draft Version of NUREG-1520
'Standard Review Plan for the Review of a License Application
for a Fuel Cycle Facility': Chapter 6 - Chemical Process Safety**

Dear Mr. Sherr:

The Nuclear Energy Institute (NEI)¹ and its industry members are undertaking detailed reviews of each chapter of the draft Standard Review Plan (SRP) released on June 2, 1999 as part of SECY-99-147. To provide effective guidance on implementation of 10 CFR 70, we believe the SRP should be concisely written and accurately reflect the 'risk-informed, performance-based' regulatory approach incorporated into the Part 70 rule revisions.

Accompanying this letter are NEI's comments on Chapter 6 ('*Chemical Process Safety*') of the draft SRP. The review is presented in two parts: (i) general comments on the sub-chapter, and (ii) specific language (or stylistic) improvements presented on a red-lined version of the draft SRP sub-chapter. In view of the number and complexity of NEI's proposed improvements, a second copy of SRP Chapter 6 has been prepared from which the red-lined text deletions have been removed. This

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

version of draft SRP Chapter 6 will enable you to more clearly understand the improvements which NEI is recommending.

Mr. Theodore S. Sherr
U.S. Nuclear Regulatory Commission
August 20, 1999
Page 2

NEI is pleased that many improvements to the draft SRP developed in public meetings and workshops and proposed by industry have been incorporated into this latest draft of the SRP. The June, 1999 revision is markedly improved over earlier versions issued in 1998 and we compliment the staff for this accomplishment.

We look forward to working with you and your staff to make NUREG-1520 a clear and concise document that will facilitate implementation of the new provisions of 10 CFR Part 70. Please feel free to contact me should you have any questions concerning the proposed improvements in the attachment to this letter.

Sincerely,

Felix M. Killar, Jr.
Director, Material Licensees and Nuclear Insurance

c. Mr. Marvin S. Fertel
Dr. Carl J. Paperiello, Director NMSS