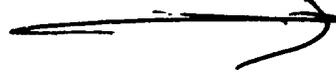




NUCLEAR ENERGY INSTITUTE

John Fry



PKadambur / W Ruppel

We will need to write resolution of comments document! This can be part of final report or a separate standalone document. Please advise. Is this letter in ADAMS
JER

ALAN M. MARION
Director, Programs Department
NUCLEAR GENERATION

June 14, 2000

Mr. Charles E. Rossi
Director
Division of Systems Analysis and Regulatory Effectiveness
Office of Nuclear Reactor Research
U.S. Nuclear Regulatory Commission
Mail Stop T-10 E32
Washington, DC 20555-0001

SUBJECT: Draft Report, "Regulatory Effectiveness of the Station Blackout Rule"

Dear Mr. Rossi:

We appreciate the opportunity to participate in the "peer review" process and the opportunity to comment on the subject report.

The approach used to assess the effectiveness of this rule appears to be reasonable. We suggest that the assessment focus on regulatory requirements as opposed to "expectations." The requirements of 10 CFR 50.63, *Loss of All Alternating Current Power*, should be the primary consideration.

The conclusion that this rule provides "additional defense-in-depth to compensate for potential degradation of the ac offsite power system that may result from deregulation of the electric power industry..." is not substantiated. Such statements are speculative at best and should not be included in the report. We believe the rule supports the conclusion in the report that licensees have demonstrated a coping capability to deal with loss of offsite power consistent with the requirements of the station blackout rule.

we will have to elaborate with the prevention-mitigation model.

The development of the trigger value concept for monitoring EDG target reliability involved extensive interactions between industry, NRC staff and ACRS. The NRC Office of Research contracted Dr. E. Lofgren, Science Applications International Corporation (SAIC), to conduct an independent review. His review confirmed the appropriateness of this trigger value concept as a mechanism for EDG target

Bill: Have you seen this?

*focus is on 199. 10 CFR 50.63
make expectations a framework
theme.*

Mr. Charles E. Rossi

June 14, 2000

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reliability. The trigger value concept was never intended to represent a robust statistical basis for individual EDG reliability.

The Commission issued a Staff Requirements Memorandum on SECY-90-340 dated June 28, 1991, that provided acceptance of the trigger value concept within the framework of the reliability levels assumed in the station blackout rule coping analysis.

Did we reference this?

We support the concept of ensuring that regulatory documents are coherent and consistent with the regulation. New issues that may arise during implementation should be addressed within the appropriate guidance documents. However, proposed modifications to regulatory documents should not impose new requirements beyond what is stated in the regulations. If NRC concludes that new requirements or clarifications to existing requirements are necessary, then rulemaking would be warranted.

} agreed

Please call me at (202) 739-8080 or email am@nei.org if you have any question or wish to discuss these comments in further detail.

Sincerely,

Alex Marion

Alex Marion

AM/amj

c: Mr. William S. Raughley, NRC-RES