



NUCLEAR ENERGY INSTITUTE

**James W. Davis**  
DIRECTOR, OPERATIONS  
NUCLEAR GENERATION DIVISION

October 20, 2000

Glenn M. Tracy  
Chief, Operator Licensing  
Human Performance and Plant Support Branch  
Mail Stop O6-D17  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Mr. Tracy:

The industry and NRC staff have been considering a pilot program to test key concepts being considered in the current rulemaking effort to risk inform 10 CFR Part 73. Based on public interactions with the NRC staff and other stakeholders in July and September, the industry's Security Working Group (SWG) has revised the draft guidance to address the open issues.

Enclosed, for NRC staff review, is NEI 99-07 (Draft 6), *Safeguards Performance Assessment Program*. I request that any further comments be provided to NEI as soon as possible so that the document can be finalized and distributed to the industry. The Security Working Group (SWG) believes that a pilot program is needed to determine if any additional refinements to the guide are needed. Our goal is to have an acceptable guidance document, ready for pilot plant use, by the end of November.

If you have any questions or comments please contact me at 202-739-8105, [jwd@nei.org](mailto:jwd@nei.org).

Sincerely,

A handwritten signature in black ink, appearing to read "James W. Davis", is written over a horizontal line.

James W. Davis

JWD/maa

Enclosure

c: SWG