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July 16, 2001

Mr. Michael Lesar  
Chief, Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
Mail Stop T-6D59  
U.S. Nuclear Regulatory Commission  
Washington, DC 20005-0001

Re: Model Safety Evaluation on Technical Specification Improvement to  
Modify Requirements Regarding Missed Surveillances Using the  
Consolidated Line Item Improvement Process

Dear Mr. Lesar:

On June 14, 2001, the U.S. Nuclear Regulatory Commission ("NRC") published in the *Federal Register* a model safety evaluation ("SE") and a model no significant hazards consideration ("NSHC") determination relating to modification of requirements regarding missed surveillances imposed on licensees through technical specifications. The purpose of these model documents is to permit the NRC Staff to efficiently process amendments that propose to address missed surveillances. We submit this letter on behalf of the Licensing and Design Basis Clearinghouse ("Clearinghouse"),<sup>1</sup> endorsing this NRC Staff initiative and supporting expanded use of the Consolidated Line Item Improvement Process ("CLIP").

Overall, we commend the NRC Staff for proposing this proactive approach to simplifying and expediting the regulatory process. We believe that use of the CLIP methodology offers benefits to licensees and, at the same time, continued protection of the public health and safety. In particular, the initiative minimizes the impact on plant risk resulting from the performance of a missed surveillance test by allowing flexibility in considering plant conditions and other plant activities without compromising plant safety.

<sup>1</sup> The Licensing and Design Basis Clearinghouse is a consortium of nuclear utility licensees representing a number of nuclear power plants.

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Mr. Michael Lesar  
July 16, 2001  
Page 2

We note that the proposed model SE and NSHC determination did not contain a recommended schedule for the submittal of amendment requests. When the Staff issued the notice of availability for referencing a model SE and NSHC determination for Technical Specification Improvement to Eliminate Requirements on Post Accident Sampling Systems, it provided for a period of one year during which licensees could reference the model documents. See 65 Fed. Reg. 65,018 (2000). Similarly, the Commission should provide for a period of at least a year during which licensees may reference the model SE and NSHC determination.

We appreciate the opportunity to comment on this innovative regulatory initiative. We urge the Staff to continue to expand its use of the CLIP in the future.

Sincerely,

Mark J. Wetterhahn  
Brooke D. Poole