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July 15, 2002

Rules and Directives Branch Office of Administration U. S. Nuclear Regulatory Commission Washington, DC 20555-0001

SUBJECT: Comments on Draft Regulatory Guide DG-1118, Application of the Single-Failure Criterion to Safety Systems," (67 Fed. Reg. 32070)

Response to Request for Comments

PROJECT NUMBER: 689

The Nuclear Energy Institute (NEI)¹ has reviewed draft Regulatory Guide DG-11118, issued for public comment on May 13, 2002. Based upon this review, we have no comments on the draft guide.

NEI encourages consideration of the comments submitted by Winston & Strawn², on behalf of the Nuclear Utility Backfitting and Reform Group.

Please direct questions to John Butler (202-739-8108, jcb@nei.org).

Sincerely,

Alexander Marion

JCB/maa

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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.

² NUBARG to NRC Rules and Directives Branch, Comments Concerning Draft Regulatory Guide DG-1118, "Application of the Single-Failure Criterion to Safety Systems," 67 Fed.Reg. 32,069, dated July 15, 2002