



NUCLEAR ENERGY INSTITUTE

Alexander Marion
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January 13, 2004

Dr. P. T. Kuo
Program Director, License Renewal and Environmental Impacts
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

PROJECT NUMBER: 690

Dear Dr. Kuo:

This letter summarizes the industry response to ISG-9, *Guidance on the Identification and Treatment of Structures, Systems, and Components Which Meet 10 CFR 54.4(a)(2)*. The industry views are summarized in Appendix F of NEI 95-10, Revision 4, *Industry Guideline for Implementing the Requirements of 10 CFR Part 54 – The License Renewal Rule*. Because this document provides detailed guidance on the treatment of this subject by license renewal applicants, we recommend that you determine this ISG to be unnecessary, in keeping with the ISG process described in your letter of December 12, 2003. We further recommend that the GALL be updated to reflect the NEI 95-10 guidance.

NRC first proposed interim staff guidance on this subject to the industry and other stakeholders in letters dated December 3, 2001, and March 15, 2002. On February 24, 2003, NEI transmitted for staff comments an industry guidance document based on positions taken by previous and near-term applicants. In a meeting on May 15, 2003, NRC staff provided comments on this industry guidance document. Industry representatives then revised the guidance document to address the staff comments raised at that meeting. This revision was incorporated into NEI 95-10 Revision 4 as noted above.

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We therefore believe this issue should be closed and the ISG determined to be unnecessary, since NEI 95-10 Appendix F addresses the issues raised by the NRC in May.

Please contact me at 202.739.8080; am@nei.org or Fred Emerson at 202.739.8086; fae@nei.org with any questions about this matter.

Sincerely,

A handwritten signature in cursive script that reads "Alex Marion". The signature is written in dark ink and is positioned to the left of a vertical line.

Alex Marion

c: K. Steven West, NRC
Dr. Samson Lee, NRC
Peter Kang, NRC