



NUCLEAR ENERGY INSTITUTE

4/29/04
69 FR 23542

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May 28, 2004

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
Mail Stop T-6-D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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SUBJECT: Notice of Opportunity to Comment on Model Safety Evaluation on Technical Specification Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Reports (69 FR 23542)

The Nuclear Energy Institute (NEI) strongly supports the changes proposed in the subject Federal Register Notice, published on April 29, 2004, for several reasons: (1) the changes will significantly reduce the burden associated with the submittal of operating statistics, (2) the changes are a positive outcome from NRC's "reduction of unnecessary burden" (RUBI) initiative, (3) the proposal is based on a successful collaboration between the nuclear industry and the Institute of Nuclear Power Operations (INPO) to develop a "consolidated data entry" (CDE) process for the efficient compilation of operational data, and (4) the proposal is another example of the value and effectiveness of the NRC's "consolidated line item improvement process" (CLIIP).

NEI has one specific comment. The third paragraph of the *Applicability* section of the Federal Register Notice on page 23543 states that "Each licensee requesting approval to revise their technical specifications using the CLIIP will make a regulatory commitment to provide to the NRC the information defined in Generic Letter 97-02, 'Revised Contents of the Monthly Operating Report,' by the 21st of the month following the end of each calendar quarter." We request that the submittal date be revised to the 30th of the month following the end of each calendar quarter. This will provide administrative scheduling margin for the CDE process.

E-REIDS=ADM-03
ADM = W. Beckley (CDE)

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Chief Rules & Directives Branch

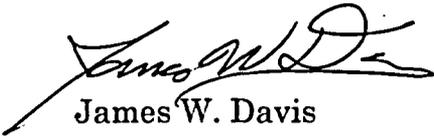
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Assuming the NRC announces the availability of the change in a subsequent Federal Register notice, NEI recommends that all operating reactor licensees submit conforming license amendment requests to adopt the changes in accordance with the CLIIP concept.

If you have questions about this letter, please contact Michael Schoppman at (202) 739-8011; mas@nei.org.

Sincerely,



James W. Davis

c: Eric Leeds, NRC
William Reckley, NRC
NEI Administrative Points of Contact