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June 1, 2004

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
United States Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, DC 20555-0001

SUBJECT: Requested Comments on *"Proposed Generic Communication; Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized Water Reactors,"* (69 FR 16980; March 31, 2004)

Dear Ladies and Gentlemen:

Progress Energy, Inc. (PGN) supports efforts to expeditiously resolve GSI-191, "Assessment of Debris Accumulation on PWR Sump Performance." PGN has reviewed the comments that are to be submitted separately by the Nuclear Energy Institute and endorses those comments as reasonable and appropriate. PGN also provides the following additional comments:

- In a manner similar to Bulletin 96-03, the proposed generic letter should clearly acknowledge the continued safe operation of the plants under the current licensing basis until this issue can be resolved.
- Throughout the proposed generic letter, greater clarity is needed in discussing the current licensing basis, Commission's requirements, regulatory requirements, and other such terms, especially with regard to compliance.
- The term "containment walkdown surveillance" under *"Requested Information"* 1(b) should be clarified as being equivalent to the NEI 02-01 walkdown or an appropriate definition should be provided.
- The 15 days to submit an alternate course of action under *"Required Response"* (2) seems to be an inadequate period of time. Thirty days would seem more appropriate.

Please contact me at (919) 546–4579 if you have any questions.

Sincerely,

Tony Groblewski
Supervisor - Regulatory Affairs

HAS

E-RFDS = ADM-03
add = C. Petrone (CDP)

Template = ADM-013