July 14, 2004

Mr. Biff Bradley Nuclear Energy Institute Suite 400 1776 I Street, NW Washington, DC 20006-3708

Dear Mr. Bradley:

The Nuclear Regulatory Commission (NRC) has completed its initial review of the Nuclear Energy Institute (NEI)/Electric Power Research Institute (EPRI) proposed Risk Management Technical Specifications (RMTS) Guidelines of October 2003, for implementation of RMTS Initiative 4b. RMTS Initiative 4b proposes the use of Risk-Informed Completion Times through the application of a configuration risk management program in conformance with the guidance presented in the RMTS Guidelines. Enclosure 1 are staff comments and requests for additional information (RAIs) on the RMTS Guidelines.

The NRC has completed its initial review of the CE generic single High Pressure Safety Injection system proposed technical specification (TS) pilot, TSTF-424, for RMTS Initiative 4b, dated January 21, 2003. Enclosure 2 are staff comments and requests for additional information (RAIs) on TSTF-424.

The NRC has completed its initial review of the South Texas Project (STP) complete plant proposed pilot for RMTS Initiative 4b, dated March 18, 2003. Enclosure 3 are staff comments and requests for additional information (RAIs) on the STP proposed pilot.

We are prepared to meet with you to further discuss these comments and RAIs to ensure that the RMTS Guidelines, CE proposed pilot, and the STP proposed pilot are acceptable, and to assist in making progress on Initiative 4b.

Please contact me at (301) 415-1187 or e-mail <a href="mailto:trt@nrc.gov">trt@nrc.gov</a> if you have any questions or need further information on these proposed changes.

Sincerely,

/RA/

T. R. Tjader, Senior Reactor Engineer Technical Specifications Section Reactor Operations Branch Division of Inspection Program Management Office of Nuclear Reactor Regulation

Enclosures: As stated

cc: See attached page

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Mr. Biff Bradley

cc via e-mail:

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Mr. Biff Bradley

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