



NUCLEAR ENERGY INSTITUTE

**Anthony R. Pietrangelo**  
SENIOR DIRECTOR, RISK REGULATION  
NUCLEAR GENERATION

October 29, 2004

Mr. David B. Matthews  
Director, Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Mr. Matthews:

Enclosed for NRC staff review is a revised final draft NEI 00-04, *10 CFR 50.69 SSC Categorization Guideline*. This document reflects the following changes from the previous draft transmitted to you on July 8:

- Discussion of the final rule has been added to the introduction;
- The rule language is provided as Appendix A;
- Rule references have been added throughout the document;
- Section 8 has been expanded to provide more detail on the final sensitivity study;
- Section 12, *Periodic Review*, has been restructured to correspond with rule paragraphs and provide additional guidance on monitoring of RISC-3 SSCs;
- Section 9, *IDP review*, particularly Section 9.2, has been rewritten to clarify the IDP considerations, based on pilot plant IDP experience; and
- Section 6, *Defense in Depth Assessment*, has been clarified based on pilot plant IDP experience.

A line-in, line-out version, and a final version are attached. We believe a public meeting should be held at your earliest convenience to discuss these changes further. Our goal remains to achieve NRC endorsement of NEI-00-04, as an acceptable approach for meeting the relevant requirements of 10 CFR 50.69, without exception.

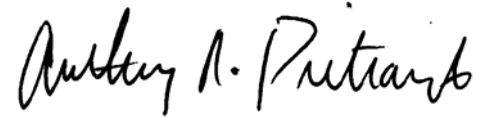
Mr. David B. Matthews

October 29, 2004

Page 2

Please contact Biff Bradley (202)-739-8083, e-mail [reb@nei.org](mailto:reb@nei.org), or me, if you have any questions.

Sincerely

A handwritten signature in black ink that reads "Anthony R. Pietrangelo". The signature is written in a cursive style with a large initial 'A' and 'P'.

Anthony R. Pietrangelo

Enclosures

cc: Ms. Suzanne C. Black  
Mr. Timothy A. Reed