

# BWR OWNERS' GROUP

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BWROG-05016  
June 15, 2005

4/12/05

70 FR 19125

8

Project Number 691

Mr. Michael T. Lesar  
Chief, Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

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RULES AND DIRECTIVES  
BRANCH  
USNRC

**SUBJECT:** Proposed Generic Communication; *Grid Reliability and the Impact on Plant Risk and the Operability of Offsite Power* (70 Fed. Reg. 19125, April 12, 2005)

Dear Mr. Lesar:

The Boiling Water Reactor Owners Group (BWROG) appreciates the opportunity to comment on the subject communication. This proposed communication is intended to gather information to determine if compliance is being maintained with NRC regulatory requirements. The BWROG believes that this generic communication is not necessary for two principal reasons:

1. Utilities are in compliance with NRC regulations associated with onsite and offsite electric power systems. Much of the information requested would impose new requirements exceeding existing regulations and plant licensing bases.
2. Activities being conducted by FERC, INPO, NARUC, NERC, and NEI already address the NRC issues stated in the proposed generic communication, and the proposed generic communication will not enhance these activities.

These points are detailed in the NEI comment letter on this proposed communication, and the BWROG endorses the NEI views.

Issuing the proposed communication could interfere with and delay development of standards and guidance from various Federal agencies and industry groups such as INPO. This should be avoided. Active participation of NRC with these other agencies is the most effective way to assure that guidance and standards are developed that fully align with NRC's mission to protect the health and safety of the public.

SISP Review Complete

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E-RIDS = ADM-03

Call = A. Markley (AWM)

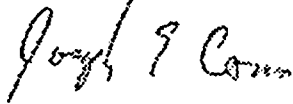
BWROG-05026

June 15, 2005

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If you have questions about this information, please contact me at 734-586-1960.

Sincerely,

A handwritten signature in black ink that reads "Joseph Conen". The signature is written in a cursive style with a large initial "J" and a stylized "C".

Joseph Conen  
BWR Owners' Group Chairman

cc: Dr. Brian W. Sheron, NRR  
Mr. Michael E. Mayfield, NRR  
Mr. Christopher L. Grimes, NRR  
BWROG Primary Representatives