



NUCLEAR ENERGY INSTITUTE

8/29/05

James W. Davis  
DIRECTOR, OPERATIONS  
NUCLEAR GENERATION DIVISION

September 28, 2005

70 FR 51098

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

(2)

**SUBJECT:** 70 FR 51098, "Notice of Opportunity to Comment on Model Safety Evaluation on Elimination of Typical License Condition Requiring Reporting of Violations of Section 2.C of Operating License Using the Consolidated Line Item Improvement Process," August 29, 2005

Dear Sir:

NEI supports the proposed change described in the reference Federal Register notice. We agree with the staff's technical evaluation that the requirement to report in accordance with the license condition is not needed because the information related to such violations that is important to the NRC's regulatory functions would become available through the inspection program, Licensee Event Reports, licensing actions, public announcements, or some other regulatory mechanism. The proposed change will also eliminate variations in reporting among licensees because not all licensees have the reference license condition.

NEI appreciates the NRC staff's initiative in identifying this opportunity to exercise the Consolidated Line Item Improvement Process (CLIIP). It is another example of the effectiveness of the CLIIP for reducing unnecessary regulatory burden.

If you have any questions regarding this topic, please contact Michael Schoppman (202-739-8011; [mas@nei.org](mailto:mas@nei.org)).

Sincerely,

James W. Davis

- c. Mr. William Reckley, NRC  
NEI Administrative Points of Contact  
NEI Licensing Contacts List

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SEP 29 2005

SISP Review Complete

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