



NUCLEAR ENERGY INSTITUTE

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December 1, 2005

10/19/05  
70FR 60859

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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**SUBJECT:** "Proposed Generic Communication: Post-Fire Safe-Shutdown  
Circuit Analysis Spurious Actuations," 70FR60859,  
October 19, 2005

The Nuclear Energy Institute (NEI)<sup>1</sup> is submitting this request for a 45-day extension to the comment period for the subject proposed generic communication. We recently held a meeting of the NEI Fire Protection Working Group and believe the following information will be needed to provide appropriate comments on the assumptions and bases noted in the proposed communication:

1. Assessment of the safety significance of multiple sequential and cumulative failures.
2. Evaluation of the industry test results and interviews with the industry project team.
3. Evaluation of the NUREG/CR-6776.
4. Assessment of NRC/licensee documentation associated with prior NRC staff positions and practices related to safe-shutdown circuit analysis.

The comprehensive nature and extensive background associated with the subject of the NRC proposed communication is such that credible and constructive comments from the nuclear energy industry cannot be provided by the requested date noted in the Federal Register. We thank you for your consideration of this request.

<sup>1</sup> NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

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If you have any questions regarding this request, please contact me at 202.739.8080; [am@nei.org](mailto:am@nei.org).

Sincerely,



Alexander Marion

c: Mr. Gary M. Holahan  
Mr. Michael D. Tschiltz  
Mr. Theodore R. Quay  
Mr. Sunil D. Weerakkody