



NUCLEAR ENERGY INSTITUTE

Anthony R. Pietrangelo
SENIOR DIRECTOR, RISK REGULATION
NUCLEAR GENERATION

December 20, 2005

Mr. T. R. Tjader, Senior Reactor Engineer
Technical Specifications Section
Reactor Operations Branch
Division of Inspection Program Management
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. Tjader:

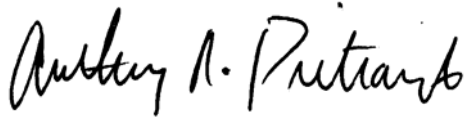
Enclosed for NRC review is information relative to risk-informed technical specification initiative 5B, which proposes to relocate surveillance test intervals to licensee control using an NRC approved risk-informed methodology. Limerick units 1 and 2 are the pilot plants for this initiative, and NEI 04-10 provides the risk-informed methodology for determination of the revised surveillance intervals. NEI 04-10 draft Revision 1 was formally transmitted to NRC on February 3, 2005. NRC provided a request for additional information (RAI) on April 12, 2005, addressing both the draft methodology document and the Limerick pilot submittal. Draft responses to the RAI were provided to NRC on October 28, 2005. This transmittal provides the following enclosures:

1. Formal response to NRC April 12, 2005, requests for additional information on NEI 04-10 draft Revision 1
2. Draft Revision 2 of NEI 04-10, incorporating revisions to address the above requests for additional information and provide additional technical detail on the surveillance interval determination process. A version reflecting changes from Revision 1 is provided, along with a version with changes accepted. Extensive changes and additions have been provided to this document, including Appendices reflecting an example surveillance test frequency evaluation form, and sample IDP charter.

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Additional RAIs have been received from NRC electrical systems branch and will be responded to separately. If you have any questions, please contact me at (202) 739-8081 or Biff Bradley at (202) 739-8083.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony R. Pietrangelo". The signature is written in a cursive, slightly slanted style.

Anthony R. Pietrangelo

Enclosures

c: Mr. Michael Tschiltz
NRC Document Control Desk