

September 29, 2006

Mr. Jack W. Roe, Director
Operations Support
Nuclear Generation Division
Nuclear Energy Institute
1776 I Street, NW, Suite 400
Washington DC 20006-3708

Dear Mr. Roe:

This is in response to your letter dated July 27, 2006 (Agencywide Documents Access and Management System Accession No. ML062680323), submitting to the NRC the Final Draft for comment of NEI 06-02, "License Amendment Request Guidelines."

We have reviewed your draft document and recommend that you expand the document's scope to include further discussion on other important license amendment request (LAR) guidelines such as the public notification and comment procedures (*Federal Register*), the consolidated line item improvement process as it applies to precedent LARs, the no significant hazards consideration determination, and the framework for providing sufficient site-specific safety analysis and licensing basis to support proposed changes. We encourage you to incorporate additional license amendment process guidelines in your document consistent with NRC guidance LIC-101, Revision 3, "License Amendment Review Procedures," and COM-203, "Informal Interfacing and Exchange of Information with Licensees and Applicants."

While we recognize the importance of standardizing the format and content of LARs as a means to improve the efficiency and effectiveness of the LAR process, we encourage you to provide more focus on ensuring that LARs are complete and that sufficient detail is provided to the NRC in terms of regulatory requirements and the protection of public health and safety.

I appreciate you providing the NRC with the opportunity to review this draft document. My staff will be available to meet with NEI to have further dialogue on the detailed comments. To coordinate any further dialogue, please contact either Richard Guzman at (301) 415-1030, or Martin Murphy, at (301) 415-3138, of my staff.

Sincerely,

/RA by CHolden for/

Catherine Haney, Director
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

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Package: ML062710562

ADAMS Accession Number: ML062710550

Incoming Accession Nos. ML062220036 and ML062680323

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