



Westinghouse

PR 50 and 53
(71FR26267)

DOCKETED
USNRC

December 28, 2006 (3:31pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Westinghouse Electric Company
Nuclear Services
P.O. Box 355
Pittsburgh, Pennsylvania 15230-0355
USA

8

U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Direct tel: (412) 374-4643
Direct fax: (412) 374-4011
e-mail: greshaja@westinghouse.com

Attn: Rulemakings and Adjudications Staff

Our ref: LTR-NRC-06-69

December 22, 2006

Subject: RIN 3150-AH81, Advanced Notice of Proposed Rulemaking (ANPR) "Approaches to Risk-Informed and Performance-Based Requirements for Nuclear Power Reactors" Federal Register Vol. 71, No. 86 / Thursday, May 4, 2006; Westinghouse Comments on Draft Rule Change

Westinghouse appreciates the opportunity to provide comments regarding the potential for the NRC to modify its approach to develop risk-informed and performance-based requirements applicable to nuclear power reactors. As noted in the Federal Register of May 4, 2006, the NRC is considering an approach that, in addition to the ongoing effort to revise some specific regulations to make them risk-informed and performance-based, would establish a comprehensive set of risk-informed and performance-based requirements applicable for all nuclear power reactor technologies as an alternative to current requirements.

Westinghouse suggests that the rule should apply to major components as well as complete plant designs so that new materials, new designs and changes to licensing approaches would be covered as well. The reason for this comment is that as new technologies are developed that impact materials and designs, the current licensing framework may become obsolete or at least require a reevaluation.

If you have any questions or require additional information, please contact me at (412) 374-4643.

Very truly yours,

J. A. Gresham, Manager
Regulatory Compliance and Plant Licensing

Template = SECY-067

SECY-02

cc: Jon H. Thompson, NRC
C. B. Brinkman, Rockville
B. F. Maurer (ECE 4-7A)
J. T. Crane (ECE 4-7A)
E. J. Lahoda (S&TD)
R. B. Sisk (ECE 514A)
M. Y. Young (Columbia)
S. A. Paletta (WM FIQ15)
Lars Hallstadius (Västerås)