NUCLEAR ENERGY INSTITUTE

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NRC Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Submittal of NEI 07-11, *Generic FSAR Template Guidance for Cost-Benefit Analysis for Radwaste Systems for Light-Water-Cooled Nuclear Power Reactors*, Revision 0

Project Number: 689

This letter provides NEI 07-11, *Generic FSAR Template Guidance for Cost-Benefit Analysis for Radwaste Systems for Light-Water-Cooled Nuclear Power Reactors*, Revision 0, for NRC review and endorsement in accordance with 10 CFR 50.4. The industry has developed this guidance generically for use by design certification (DC) and combined license (COL) applicants. Development of this generic cost-benefit analysis for radwaste systems will assure a consistent approach to the preparation of COL applications in this area that is in accordance with the NRC requirements and guidance. Such an approach will reduce industry and NRC resource burden associated with the development, review, and approval of COL applications. Only a single staff review is required and this may be accomplished in advance of actual COL applications.

As we have discussed in public meetings, we have undertaken development of this generic template report to provide further guidance to DC and COL applicants on implementing applicable NRC guidance in RG 1.206. In these public meetings, the staff recognized the value and standardization benefits of such guidance and strongly encouraged this approach, which is consistent with the NRC's design-centered review concept.

The technical report meets the requirements described in the NRC (NRR) Office Instruction, LIC-500, which contains criteria for submitting reports for NRC review and approval. Specifically, the report:

1. Deals with the specific safety-related subject regarding a required operational program that requires a safety assessment by the NRC staff.
2. Will be incorporated or referenced in subsequent DC and COL applications.
3. Contains complete and detailed information on the applicant's proposed means for performing a cost-benefit analysis to confirm that items of reasonably demonstrated technology have been incorporated into radwaste systems to maintain doses to members of the public as low as is reasonable achievable (ALARA).

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4. Will increase the effectiveness and efficiency of NRC review and approval of DC and COL applications that reference the template.

The industry and the NRC place a high priority on standardization of COL applications and reviews that will enable COL applications to be developed and reviewed in a more efficient and productive manner. NEI 07-11 reflects discussion in public meetings to date, and we are prepared to discuss the guidance further or respond to NRC questions to help facilitate the staff's review.

As noted in NEI 07-11, a highly conservative approach is used, in which it is assumed that the radwaste treatment system augments are viewed in isolation with no credit for multiple augments. We welcome further discussion with NRC during the review process in regard to possible alternatives that might be employed to produce less restrictive, but still reasonably conservative, threshold values, below which, no further analysis by the applicant would be necessary.

To support near term COL applications, we request an expedited review schedule that supports the earliest possible SER issuance. Our objective is an SER that states that NEI 07-11 provides an acceptable method for (1) complying with the requirement in 10 CFR 50, Appendix I, Section II.D, and (2) satisfying the applicable acceptance criteria of SRP 11.2, 11.3, and 11.4.

Consistent with an NRC letter dated September 7, 2007, COL applications submitted before an SER is issued will refer to NEI 07-11, Revision 0, and will indicate that the document is under NRC review. We propose that applications submitted prior to issuance of an SER should not include any supplemental analysis in regard to Section II.D to Appendix I to 10 CFR 50 until the template guidance and associated approach and threshold values are finalized.

If you have any questions, please contact me or Ralph Andersen at 202-739-8111; rla@nei.org.

Sincerely,

Russell J. Bell

Enclosure

c: Mr. Patrick M. Madden, NRC
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