

April 1, 2008

Mr. Anthony R. Pietrangelo
Vice President, Regulatory Affairs
Nuclear Energy Institute
1776 I Street, NW., Suite 400
Washington, DC 20006-3708

Dear Mr. Pietrangelo:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your March 3, 2008, letter from the Nuclear Energy Institute (NEI) concerning the NEI position on the draft license renewal interim staff guidance (LR-ISG) which addresses the inclusion of equipment relied upon to meet the requirements of the Station Blackout (SBO) Rule (Title 10, Section 50.63, "Loss of all alternating current power," of the Code of Federal Regulations (10 CFR 50.63)) within the scope of license renewal.

The NEI letter was based upon an earlier draft of LR-ISG. This draft of LR-ISG has been rewritten to clarify that "The SBO recovery path scoping boundary ends at the line side of the switchyard breaker(s) at transmission system voltage" (LR-ISG-2008-01, Rationale section, 13th paragraph). This position, as clarified, does not represent a change from the prior position the staff developed, with industry input, during the initial implementation of the license renewal Rule.

During the review of several license renewal applications, the NRC staff determined that some applicants had not identified all structures, systems, and components (SSCs) required to be included within the scope of license renewal in accordance with the requirements of 10 CFR 54.4(a)(3) for SBO. The NRC guidance for the staff's review of this area is provided in NUREG-1800, Revision 1, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants," issued September 2005 (SRP-LR).

Subsequent to the staff's identification of this issue, NRC management and staff met with NEI and industry representatives at several public meetings to discuss this issue and to clarify the staff's position contained in the SRP-LR. As a result of these discussions, the NRC staff identified the need to issue a clarification to LR-ISG that would provide additional details for license renewal scoping for SBO SSCs.

On March 5, 2008, the NRC staff issued the proposed LR-ISG for public comment and sent a letter to Mr. James H. Riley of NEI requesting comments on the proposed LR-ISG. The opportunity for public comment was also noticed in the *Federal Register* (FR) on March 12, 2008 (73 FR 13258). I encourage NEI and industry representatives to submit comments on the proposed LR-ISG through the formal process as described in the *Federal Register* notice (the final date for comments is May 12, 2008). At the end of the comment

A. Pietrangelo

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period, the NRC staff will review and disposition the comments. If you have any questions regarding this matter, please contact Ms. Stacie Sakai, by telephone at 301-415-1884 or by e-mail at sxs11@nrc.gov.

Sincerely,

/RA/

J. E. Dyer, Director
Office of Nuclear Reactor Regulation

cc: attached list

A. Pietrangelo

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Sincerely,

/RA/

J. E. Dyer, Director
Office of Nuclear Reactor Regulation

cc: attached list

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