RUG I
REGION I UTILITY GROUP

May 23, 2008

Mr. Robert Gramm
Division of Inspection and Regional Support
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments on the Proposed Changes to Inspection Procedure 95003 and Manual Chapter 0305

Dear Mr. Gramm,

The Region 1 Utility Group (RUG1) was established to help promote open and efficient communications between Region I utilities and the NRC regarding the Reactor Oversight Process, inspection, enforcement and licensing activities. RUG1 members are the licensing managers, or equivalent, representing the Beaver Valley, Calvert Cliffs, Fitzpatrick, Ginna, Hope Creek, Indian Point, Limerick, Millstone, Nine Mile Point, Oyster Creek, Peach Bottom, Pilgrim, Salem, Seabrook, Susquehanna, Three Mile Island and Vermont Yankee plants.

RUG 1 is very concerned about changes being made to the safety culture inspection process so soon after its implementation. The safety culture inspection process is not mature and therefore great care must be taken with any revision to ensure that the changes truly are required, improve the process and provide a net positive benefit. With these concerns in mind, RUG 1 provides the attached comments to address the proposed changes to IP 95003, MC 0305 and the Palo Verde and cross cutting issues lessons learned as were discussed during the public meeting on April 17, 2008.

On behalf of RUG1, I wish to thank you for your consideration of this suggestion. If you have any questions or alternative solutions, please contact me at 603-773-7194.

Very truly yours,

James M. Peschel
RUG I Chairman

cc: RUG1 Leadership Contacts
Mr. J. Butler, Nuclear Energy Institute
Ms. J. Keys, Nuclear Energy Institute