



NUCLEAR ENERGY INSTITUTE

**John C. Butler**  
DIRECTOR, SAFETY FOCUSED REGULATION  
NUCLEAR GENERATION DIVISION

June 27, 2008

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

**Subject:** Comments on Proposed Changes to Inspection Procedure 71152 and Manual Chapter 0612

**Project Number: 689**

Dear Mr. Gramm:

Enclosed are industry comments on draft changes to Inspection Procedure 71152, Identification and Resolution of Problems, and Manual Chapter 0612, Power Reactor Inspection Reports. The draft changes were distributed and discussed during the May 14, 2008 public meeting of the Reactor Oversight Process Working Group.

We appreciate the opportunity to comment on these proposed changes. The enclosed comments are limited to the changes discussed during the May 14 meeting. Additional changes to Manual Chapter 0612 were discussed during a public meeting on June 18, 2008. We encourage staff efforts to incorporate the changes discussed during the June 18 meeting in an expeditious manner.

We remain concerned with the manner in which changes to safety culture aspects of the Reactor Oversight Process are being developed and implemented. While we agree that minor clarifications in certain areas are needed, it is important that a more comprehensive evaluation be performed on the efficacy of the current process, before any significant changes are considered for implementation.

Mr. Robert A. Gramm

June 27, 2008

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If you have any questions regarding these comments please contact me or Julie Keys at (202) 739-8128; [jyk@nei.org](mailto:jyk@nei.org).

Sincerely,

A handwritten signature in black ink, appearing to read "John C. Butler". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John C. Butler

Enclosure

c: Mr. James W. Andersen, U.S. Nuclear Regulatory Commission  
Mr. Timothy J. Kobetz, U.S. Nuclear Regulatory Commission  
Mr. Timothy C. Kolb, U.S. Nuclear Regulatory Commission  
NRC Document Control Desk