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NUCLEAR ENERGY INSTITUTE

Ralph E. Beedle
SENIOR VICE PRESIDENT AND
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NUCLEAR GENERATION

February 8, 2002

The Honorable Richard A. Meserve
Chairman
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Chairman Meserve:

NEI recently filed the enclosed petition to amend 10 CFR 50.46 and related Part 50 appendices. The proposed amendment would allow an alternative break size to be assumed in ECCS evaluation models in lieu of the doubled-ended rupture of the largest pipe in the reactor coolant system.

The large break loss of coolant accident (LBLOCA) is a central element in the current regulatory framework. It is the basis for numerous regulatory requirements and actions. As such, it dictates the allocation of extensive NRC and licensee resources. Yet, based on insights from modern analytical tools, the double-ended rupture is widely viewed as an incredible event of very low safety significance. Thus, its continued prominence in the regulatory framework is inconsistent with the agency's commitment to risk-informed regulation.

The adoption of the proposed amendment would enable technical discussions on redefining the LBLOCA to proceed without being in conflict with the current rules. By amending the regulation in parallel with the technical work, it is estimated that regulatory improvements could be expedited by up to two years.

We look forward to working with the NRC on risk-informed improvements to the technical requirements in Part 50. If you or your staff has any questions regarding the petition, please contact me or Tony Pietrangelo (202-739-8081, arp@nei.org).

Sincerely,

Ralph E. Beedle

Enclosure

The Honorable Richard A. Meserve

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- c: The Honorable Greta Joy Dicus, Commissioner, NRC
- The Honorable Nils J. Diaz, Commissioner, NRC
- The Honorable Edward McGaffigan Jr., Commissioner, NRC
- The Honorable Jeffrey S. Merrifield, Commissioner, NRC
- Dr. William D. Travers, Executive Director for Operations, NRC