



NUCLEAR ENERGY INSTITUTE

**Russell J. Bell**  
DIRECTOR, NEW PLANT LICENSING  
NUCLEAR GENERATION DIVISION

December 17, 2008

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

**Subject:** Submittal of NEI 08-08, *Generic FSAR Template Guidance for Life-Cycle Minimization of Contamination*, Revision 0

**Project Number: 689**

This letter provides NEI 08-08, *Generic FSAR Template Guidance for Life-Cycle Minimization of Contamination*, Revision 0, for NRC review and endorsement in accordance with 10 CFR 50.4. The industry has developed this guidance generically for use by all combined license (COL) applicants. Development of this generic program description for life-cycle minimization of contamination will assure a consistent approach to the preparation of COL applications in this area that is in accordance with 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 and other generic operational program descriptions to provide further guidance to COL applicants on implementing NRC guidance in RG 1.206 that calls for operational programs to be "fully described" in the FSAR. In these public meetings, the staff recognized the value and standardization benefits of such guidance and strongly encouraged this approach, which is consistent with 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-COL applications;
3. Contains complete and detailed information on (i.e., "fully describes") the applicant's proposed means for life-cycle minimization of contamination; and

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

The industry and 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 08-08 reflects discussions 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.

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 08-08 provides an acceptable method for (1) complying with the requirement in 10 CFR 52.79(a)(3) that FSARs describe the operational means for life-cycle minimization of contamination as set forth in 10 CFR Part 20.1406, and (2) satisfying the applicable acceptance criteria of SRP Section 12.

Certain sections of NEI 08-08 refer to procedures and programs "consistent with" applicable sections of NEI 07-07, *Industry Ground Water Protection Initiative – Final Guidance Document*, August 2007, and EPRI –TR-1016099, *Groundwater Protection Guidelines for Nuclear Power Plants*, January 2008 (Public Edition), which provide detailed guidance for implementing the respective provisions of NEI 08-08. As such, the applicable sections of the two referenced documents form a part of the technical basis for NEI 08-08 and should be factored into the NRC staff review and development of the respective safety evaluation. Accordingly, copies of both documents are enclosed with this letter to help support the NRC staff review of NEI 08-08.

Consistent with the NRC letter dated September 7, 2007, COL applications submitted or amended before an SER is issued will refer to NEI 08-08, Revision 0, and will indicate that the document is under NRC review.

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

Sincerely,



Russell J. Bell

Enclosure

c: Mr. Patrick M. Madden, U.S. Nuclear Regulatory Commission  
Mr. Michael A. Canova, U.S. Nuclear Regulatory Commission  
Mr. William D. Reckley, U.S. Nuclear Regulatory Commission  
Mr. Timothy J. Frye, U.S. Nuclear Regulatory Commission