



NUCLEAR ENERGY INSTITUTE

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October 15, 2008

Chief, Rules and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-001

Subject: Industry Comments on Interim Staff Guidance on Winter Precipitation Loads for Seismic Category 1 Structures (ISG-7)

Project Number: 689

The Nuclear Energy Institute (NEI)¹ is pleased to provide the following industry comment on the subject draft Interim Staff Guidance (ISG):

On page 4 under "Issues," there is a bullet stating that "an additional site characteristic for evaluating extreme load winter precipitation events should be provided to account for additional weight if at least part of the 48-hour PMWP falls as frozen precipitation." Subsequently, the ISG states that "roof loads due to the extreme winter precipitation event shall be the higher roof load resulting from either the extreme frozen winter precipitation event or the extreme liquid winter precipitation event." The guidance does not define how the additional site characteristic should be determined and used, and it is not consistent with the rest of the ISG. We recommend the subject bullet on page 4 be deleted.

We look forward to any feedback the NRC staff may be able to provide during the upcoming Generic Issues Public Meeting on November 6, 2008.

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

Chief, Rules and Directives Branch

October 15, 2008

Page 2

If you have any questions about the industry comment, please contact me or Kimberly Keithline (202-739-8121, kak@nei.org).

Sincerely,

A handwritten signature in black ink, appearing to read "RJB", written in a cursive style.

Russell J. Bell

c: Mr. William Reckley, U.S. Nuclear Regulatory Commission
Ms. Nanette Giles, U.S. Nuclear Regulatory Commission
Mr. Charles Cox, U.S. Nuclear Regulatory Commission
NRC Document Control Desk