

Supplemental PR 50 and 52  
(74FR40005)

Rulemaking Comments

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**From:** BELL, Denise [dxb@nei.org] on behalf of BRADLEY, Biff [reb@nei.org]  
**Sent:** Tuesday, August 18, 2009 9:59 AM  
**Subject:** Request for a 120-day Extension to the Comment Period for Supplemental Proposed Rule  
**Attachments:** 08-18-09\_NRC\_Request for a 120-day Extension to the Comment Period for Supplemental Proposed Rule.pdf

August 18, 2009

DOCKETED  
USNRC

August 18, 2009 (11:30am)

Mr. Richard F. Dudley, Jr.  
Senior Project Manager  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

**Subject:** Request for a 120-day Extension to the Comment Period for Supplemental Proposed Rule, *Risk-Informed Changes to Loss-of-Coolant Accident Technical Requirements* (Federal Register of August 10, 2009, 74 FR 40006-40052).

**Project Number: 689**

Dear Mr. Dudley:

The subject *Federal Register* notice issued for public comment a supplemental proposed rule, *Risk-Informed Changes to Loss-of-Coolant Accident Technical Requirements*. Comments on the supplemental proposed rule were requested by September 24, 2009. The purpose of this letter is to request a 120-day extension to this comment period, which would result in a comment due date of January 22, 2010.

This supplemental proposed rule would allow licensees to utilize a risk-informed alternative for meeting requirements for analyzing emergency core cooling systems during loss-of-coolant accidents, and implementation of the rule as currently drafted would require technical analyses in a wide variety of areas. It is therefore necessary to solicit input from numerous sources in developing comments on the draft supplemental proposed rule, and NEI is coordinating industry comments with the NSSS owners groups, vendors, and licensees to ensure that the comments submitted by industry are of high quality and that they reflect a consensus industry perspective. However, the comment period provided in the August 10 *Federal Register* Notice is insufficient given the volume and breadth of material that requires a thorough technical review. Extending the comment period would provide the time necessary to fully assess the impact of the draft supplemental proposed rule and arrive at a set of comments that are of highest value to the NRC staff in considering this important rulemaking. We would note that this rule has been many years in development, and the current proposed rule is significantly different from previous versions.

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Thread-Index: AcogC//NKPMPdjnnRemS1051eu7Ijg==  
From: "BRADLEY, Biff" <reb@nei.org>  
Sender: "BELL, Denise" <dxb@nei.org>  
To: undisclosed-recipients;;  
Return-Path: dxb@nei.org



NUCLEAR ENERGY INSTITUTE

**Biff Bradley**  
DIRECTOR  
RISK ASSESSMENT  
NUCLEAR GENERATION DIVISION

August 18, 2009

Mr. Richard F. Dudley, Jr.  
Senior Project Manager  
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U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

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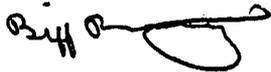
Mr. Richard F. Dudley, Jr.

August 18, 2009

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We appreciate your consideration of this request. Since the current due date for comments is already near, we respectfully request timely feedback. If you have any questions or require additional information, please contact me at 202.739.8083; [reb@nei.org](mailto:reb@nei.org) or Victoria Anderson at 202.739.8101; [vka@nei.org](mailto:vka@nei.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Biff", followed by a large, stylized flourish or loop.

Biff Bradley

c: Rulemakings and Adjudications Staff  
Mr. Mark A. Cunningham, NRR/ADES/DRA, NRC  
NRC Document Control Desk