

Southern Nuclear  
Operating Company, Inc.

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OFFICE OF SECRETARY  
RULEMAKINGS AND  
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Energy to Serve Your World  
NL-09-1658

Docket Nos.: 50-321 50-348 50-424 52-025  
50-366 50-364 50-425 52-026

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555-0001

Joseph M. Farley Nuclear Plant  
Edwin I. Hatch Nuclear Plant  
Vogtle Electric Generating Plant  
Comments on Advanced Notice of Proposed Rulemaking for  
Performance-Based Emergency Core Cooling System Acceptance Criteria

Ladies and Gentlemen:

The Nuclear Energy Institute (NEI) has prepared comments concerning the advanced notice of proposed rulemaking for performance based emergency core cooling system acceptance criteria. This letter is to advise that Southern Nuclear Operating Company (SNC) endorses the comments submitted by NEI in their letter dated October 26, 2009 and signed by James H. Riley.

Re-emphasizing NEI's position, SNC believes that the proposed rulemaking is proceeding without sufficient technical basis for some of the proposed conceptual changes. While there appears to be some benefit from the new rulemaking provisions associated with cladding, the uncertainty in the remaining portions of the proposed rule does not justify moving forward until there is further testing and discussion.

Sincerely,

M. J. Ajluni  
Nuclear Licensing Manager  
MJA/PAH/lac

Template = SECY-067

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cc: Southern Nuclear Operating Company  
Mr. J. T. Gasser, Executive Vice President  
Mr. J. A. Miller, Executive Vice President, Nuclear Development  
Mr. J. R. Johnson, Vice President – Farley  
Mr. D. R. Madison, Vice President – Hatch  
Mr. T. E. Tynan, Vice President – Vogtle  
Ms. P. M. Marino, Vice President – Engineering  
Mr. D. H. Jones, Site Vice President, Vogtle 3 & 4  
RType: Farley=CFA04.054; Hatch=CHA02.004; Vogtle=CVC7000

U. S. Nuclear Regulatory Commission  
Mr. L. A. Reyes, Regional Administrator  
Mr. R. E. Martin, NRR Project Manager – Farley  
Ms. D. N. Wright, NRR Project Manager – Hatch  
Ms. D. N. Wright, NRR Project Manager – Vogtle  
Mr. E. L. Crowe, Senior Resident Inspector – Farley  
Mr. J. A. Hickey, Senior Resident Inspector – Hatch  
Mr. M. Cain, Senior Resident Inspector – Vogtle  
Mr. F. M. Akstulewicz, Deputy Director Div. of Safety Systems & Risk  
Assessment