



NUCLEAR ENERGY INSTITUTE

Biff Bradley  
DIRECTOR  
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January 7, 2010

10/11/09  
74 FR 65810

Mr. Michael T. Lesar  
Chief, Rulemaking and Directives Branch  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

(1)

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RULES AND DIRECTIVES  
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**Project Number: 689**

**Subject:** Request for a 60-day Extension to the Comment Period for NUREG-1921 (EPRI 1019196), *EPRI/NRC-RES Fire Human Reliability Analysis Guidelines, Draft Report for Comment (Federal Register of December 11, 2010, 74 FR 65810-65811).*

Dear Mr. Lesar:

The subject Federal Register notice issued for public comment, a draft NUREG titled *Fire Human Reliability Analysis (HRA) Guidelines*. Comments on the draft NUREG were requested by February 15, 2010. The purpose of this letter is to request a 60-day extension to this comment period, which would result in a due date of April 16, 2010.

Draft NUREG-1921 gives guidance regarding performance of fire HRA, which is an integral component of development of fire Probabilistic Risk Assessment. The document describes a detailed, multifaceted process, and it is therefore necessary to solicit input from numerous sources in developing comments on the draft NUREG.

NEI is coordinating industry comments with the NSSF owners groups and licensees to ensure that the comments submitted by the industry are of high quality and that they reflect a consensus industry perspective. However, the comment period provided in the December 11, 2009 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 content of the draft NUREG and arrive at a set of comments that are of highest value to the NRC staff.

SUNSI Review Complete  
Template = ADM-013

E-REDS = ADM-03  
Add = K. Hill  
(KHH)

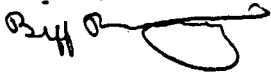
Mr. Michael T. Lesar

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We appreciate your consideration of this request and 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; [yka@nei.org](mailto:yka@nei.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Biff", followed by a stylized flourish that loops back to the left.

Biff Bradley

c: Rulemakings and Adjudications Staff  
Mr. Mark H. Salley, RES/DRA/FRB, NRC  
Ms. Kendra L. Hill, RES/DRA/FRB, NRC  
NRC Document Control Desk

Mr. Ken Canavan, EPRI