



NUCLEAR ENERGY INSTITUTE

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February 19, 2010

Mr. Glenn Tracy
Director
Division of Construction Inspection and Operational Programs
Office of New Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Response to NRC Safety Evaluation dated November 3, 2009 for NEI 06-14, Revision 7, *Quality Assurance Program Description*

Project Number: 689

NRC Safety Evaluation (SE) dated November 3, 2009 approved NEI 06-14, *Quality Assurance Program Description*, Revision 7, following numerous public meetings and discussions between the NRC and industry. Included in the SE was the following statement:

NEI Template provides as an alternative to RG 1.33, position C.4 & C.5, an applicant can follow SRP Section 17.5. The NRC staff does not agree with this alternative because SRP Section 17.5 does not address these positions. Therefore, each applicant needs to specifically address regulatory positions C.4 & C.5 or propose an acceptable alternative.

In an effort to resolve confusion about SRP Section 17.5 and secure unqualified NRC endorsement of NEI 06-14, the NRC and industry have held additional public meetings and discussions to work through this issue.

As a result of these discussions, we have revised NEI 06-14, Revision 8, and the document is attached for NRC review and endorsement. The revision is intended to address NRC comments and provide an acceptable alternative for addressing Regulatory Guide 1.33 in the Quality Assurance Program Description. As discussed with the NRC staff, we understand that the NRC will issue a new SE based on NEI 06-14, Revision 8. After the receipt of the new SE, NEI will issue a final version of NEI 06-14 that incorporates the SE.

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Also as discussed with the NRC staff, due to the narrow focus of the changes reflected in NEI 06-14, Revision 8, we request issuance of the new SE on an expedited basis to support its use in connection with COL applications currently under review.

We have also attached three items to facilitate your review:

- Redlined version of NEI 06-14, Revision 8
- List of changes vis-à-vis Revision 7
- Table of where RG 1.33 and ANSI N18.7-1976 requirements are addressed by NOA-1-1994 and/or NEI 06-14

If you have any questions or identify any issues that would undermine the objective of a clean SE, please contact me or Jim Fisicaro (202-739-8018; jjf@nei.org).

Sincerely,



Russell J. Bell

Attachments

c: Mr. William F. Burton, U.S. Nuclear Regulatory Commission
Mr. Timothy Frye, U.S. Nuclear Regulatory Commission
NRC Document Control Desk