



NUCLEAR ENERGY INSTITUTE

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February 24, 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: Submittal of Draft NEI 08-01, *Industry Guideline for the ITAAC Closure Process Under 10 CFR 52, Revision 4E*

Project Number: 689

Attached for NRC review is draft NEI 08-01, *Industry Guideline for the ITAAC Closure Process Under 10 CFR 52, Revision 4E*, for NRC staff review. This revision supplements endorsed guidance related to ITAAC closure with guidance on a number of common understandings reached in 2009 related to ITAAC maintenance. We are providing this draft as a basis for further discussion and request a public meeting in the next few weeks for that purpose.

We have also attached a redline version that indicates the changes vis-à-vis NEI 08-01, Revision 3, which was endorsed last year by Regulatory Guide 1.215. Note that for clarity, we have not redlined the following entirely new sections: 8.1.1–8.1.4, 8.6, and Appendices D-19–21, F, G, H and I.

We appreciate the constructive series of interactions with the NRC staff that have formed the basis for this submittal. We understand that the NRC plans to propose new requirements for 10 CFR 52.99 related to ITAAC maintenance. The industry guidance in this area will ultimately need to conform to any new requirements approved by the Commission in a rulemaking, and we expect to accomplish this before issuing Revision 4 as final guideline for NRC endorsement.

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We will contact your staff soon to arrange a mutually convenient time for a public meeting to discuss the proposed revisions NEI 08-01. In the meantime, please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "RJB", is positioned below the word "Sincerely,".

Russell J. Bell

Attachments

c: Mr. Mark Kowal, U.S. Nuclear Regulatory Commission
Mr. William Burton, U.S. Nuclear Regulatory Commission
Ms. Nanette Gilles, U.S. Nuclear Regulatory Commission
NRC Document Control Desk