



NUCLEAR ENERGY INSTITUTE

Biff Bradley
DIRECTOR
RISK ASSESSMENT
NUCLEAR GENERATION DIVISION

July 13, 2010

Mr. Robert L. Tregoning
Technical Advisor for Materials
Office of Nuclear Regulatory Research
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Request for a 75-day Extension to the Comment Period for DG-1216, *Plant-Specific Applicability of Transition Break Size Specified in 10 CFR 50.46a* (Federal Register of June 28, 2010, 75 FR 36698-36700)

Project Number: 689

Dear Mr. Tregoning:

The subject federal register notice issued a draft regulatory guide, *Plant-Specific Applicability of Transition Break Size Specified in 10 CFR 50.46a* for public comment. Comments on the draft regulatory guide were requested by August 25, 2010. The purpose of this letter is to request a 75-day extension to this comment period, which would result in a comment due date of November 8, 2010.

This draft regulatory guide would support implementation of proposed rule 10 CFR 50.46a, *Risk-Informed Changes to Loss-of-Coolant Accident Technical Requirements*, by describing one method for demonstrating that the generic transition break size is applicable for a specific plant seeking to implement the proposed rule. Review of this draft regulatory guide will require input from personnel with varied technical expertise in areas ranging from materials to risk-assessment to license renewal, and NEI is coordinating industry comments with the NSSL 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 June 28 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 this draft regulatory guide and arrive at a set of comments that are of highest value to the NRC staff.

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We appreciate your consideration of this request. Since the current due date for comments is already near, we request timely feedback. If you have any questions or require additional information, please contact me 202-739-8083; reb@nei.org or Victoria Anderson at 202-739-8101; vka@nei.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Biff Bradley". The signature is stylized with a large, sweeping flourish at the end.

Biff Bradley

c: Ms. Cynthia K. Bladey, ADM/DAS/RADB, NRC
NRC Document Control Desk