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To: Ms. Cindy Bladey **From:** John McCann / Anders Eng

Fax: 301-492-3446 **Pages:** As described below
(including cover page)

Phon: 301-492-3667 **Date:** August 24, 2010

e:

Re: Comments on Draft Reg Guide **cc:**
DG-1240

Urgent For Review Please Comment Please Reply Please Recycle

• **Comments:**

Entergy's comments on Draft Reg. Guide DG-1240. Original sent separately by regular US mail.

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Add = R.A. Jervey (RAS)
- M. Chee (mjc)



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John F. McCann
Vice President – Nuclear Safety,
Emergency Planning, and Licensing

ENOC-10-00028
August 23, 2010

Attn: Cindy Bladey,
Chief, Rules, Announcements, and
Directives Branch, Office of Administration,
Mail Stop: TWB-05-B01M,
U.S. Nuclear Regulatory Commission,
Washington, DC 20555-0001

**SUBJECT: Comments on Draft Regulatory Guide DG-1240;
"Condition Monitoring Program for Electric Cables Used in Nuclear Power
Plants."
Docket ID NRC-2010-0202**

Reference: NEI Letter, John C. Butler to U.S. NRC; regarding same subject,
dated August 13, 2010.

Dear Ms. Bladey:

Entergy Operations, Inc and Entergy Nuclear Operations, Inc. (Entergy) are providing this letter in response to the NRC's request for comment on draft Regulatory Guide DG-1240, as published in Federal Register Notice, 75 FRN 33853 on June 15, 2010.

The Nuclear Energy Institute (NEI) provided comments on DG-1240 in the referenced letter on behalf of the nuclear industry. Entergy agrees with and endorses NEI's comments, including the recommendation that the draft Regulatory Guide be withdrawn for the reasons presented in the NEI letter. Entergy also believes that the objectives of the proposed NRC action are better met through existing programs and recently issued industry guidance documents that provide specific guidance on appropriate cable assessment techniques and test methods. If the guidance is to be issued, Entergy believes that it should be subject to the requirements of 10 CFR 50.109 (i.e., the Backfit Rule).

Sincerely,

A handwritten signature in black ink, appearing to be "John F. McCann".

JFM/cdf/rb