



NUCLEAR ENERGY INSTITUTE

**Biff Bradley**  
DIRECTOR, RISK ASSESSMENT

December 13, 2010

Mr. Donald Helton  
U.S. Nuclear Regulatory Commission  
Office of Nuclear Regulatory Research  
Washington, DC 20555-0001

**Subject:** Request for a 75-day Extension to the Comment Period for Draft NUREG-1953, *Confirmatory Thermal-Hydraulic Analysis Risk Models – Surry and Peach Bottom (Federal Register of November 10, 2010, 75 FR 69140-69141)*

**Project Number: 689**

Dear Mr. Helton:

The subject *Federal Register* notice issued for public comment a draft U.S. Nuclear Regulatory Commission Regulation, *Confirmatory Thermal-Hydraulic Analysis Risk Models – Surry and Peach Bottom*. Comments on the draft regulatory guide were requested by December 15, 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 February 28, 2011.

This draft NUREG documents in-depth analysis of the thermal-hydraulic aspects of the Standardized Plant Analysis Risk (SPAR) models for Surry and Peach Bottom, and suggests numerous changes to improve the consistency of the SPAR models with licensee-generated analyses. Review of this draft regulatory guide will require input from personnel with varied technical expertise from several utilities, and the Nuclear Energy Institute is coordinating industry comments 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 November 10 *Federal Register* Notice is insufficient given the volume and breadth of material that merits a thorough technical review. Extending the comment period would provide the time necessary to fully assess this draft NUREG and arrive at a set of comments that are of highest value to the NRC staff.

December 13, 2010

Page 2

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 or Victoria Anderson at [vka@nei.org](mailto:vka@nei.org); 202-739-8101.

Sincerely,

A handwritten signature in black ink that reads "Biff" followed by a stylized, cursive flourish.

Biff Bradley

c: Mr. Kevin Coyne  
Rules, Announcements, and Directives Branch  
NRC Document Control Desk