



**Anthony R. Pietrangelo**  
SENIOR VICE PRESIDENT AND  
CHIEF NUCLEAR OFFICER

January 14, 2011

Mr. R. William Borchardt  
Executive Director for Operations  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Peer Assessment of Industry Implementation of the Ground Water Protection Initiative

**Project Number: 689**

Dear Mr. Borchardt:

This letter conveys a summary report (attached) of the results of the Nuclear Energy Institute-sponsored peer reviews of industry implementation of NEI 07-07, "Industry Groundwater Protection Initiative – Final Guidance Document."

The ground water protection initiative was developed through a series of public meetings with Nuclear Regulatory Commission staff and other stakeholders in 2006-2007. The final guidance document describing the initiative was issued in August 2007 as NEI 07-07. The implementation date for the initiative final guidance was set for December 31, 2008.

An integral part of the initiative is the conduct of self-assessments, followed by independent peer reviews of each nuclear power plant site's implementation of the initiative, beginning in the first year after initial implementation and every five years thereafter. The self-assessments and peer reviews utilize the 43 acceptance criteria that are spelled out in NEI 07-07. Any items for improvement identified in the self-assessments and peer reviews are to be formally addressed through the site's corrective action program.

The enclosed report summarizes the results of the first full round of NEI-sponsored peer reviews conducted in 2009-2010 by five teams of industry subject matter experts. The teams were organized in a manner that assured that no team member would be involved in a review of his or her own company's sites. By design, the peer reviews were challenging with emphasis on continuing improvement and utilization of best practices.

Mr. R. William Borchardt

January 14, 2011

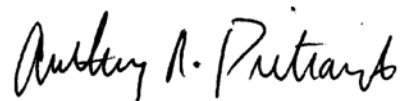
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The results of each site peer review, including identification of any items for improvement, were reported to the site management. Upon completion of the full cycle of initial peer reviews (i.e., including all sites), company chief nuclear officers followed up and confirmed that all identified items for improvement had been entered into the respective site correction action programs and had either been addressed or were on an appropriate schedule for completion.

Lessons learned and best practices identified during the peer reviews have been shared in the annual workshops on groundwater protection sponsored by NEI and the Electric Power Research Institute and attended by industry and NRC staff. EPRI has developed and issued additional technical guidelines to address two generic areas for improvement: a protocol for decision-making for remediation and a methodology for evaluating the contributions of planned and permitted releases to detectable licensed material in soil and ground water.

If you have any questions regarding the enclosed report or industry implementation of the ground water protection initiative, please contact me or Ralph Andersen, senior director for radiation safety and environmental protection, at 202.739.8111; [rla@nei.org](mailto:rla@nei.org).

Sincerely,

A handwritten signature in black ink that reads "Anthony R. Pietrangelo". The signature is written in a cursive style with a large initial 'A'.

Anthony R. Pietrangelo

Attachment