



NUCLEAR ENERGY INSTITUTE

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March 8, 2011

Mr. William F. Burton
Chief, Rulemaking and Guidance Development Branch
Division of New Reactor Licensing
Office of New Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry Response to NRC Request for Additional Information related to NEI 10-01, *Industry Guideline for Developing a Plant Parameter Envelope in Support of an Early Site Permit*, Revision 0 (Project No. 689, TAC Q00341)

Project Number: 689

Dear Mr. Burton:

Thank you for your February 3, 2011 response to our March 26, 2010 submittal of NEI 10-01, *Industry Guideline for Developing a Plant Parameter Envelope (PPE) in Support of an Early Site Permit*, Revision 0. NEI's Early Site Permit Task force has reviewed this response and has determined that we will be able to provide the additional information requested therein in the form of a revision to NEI 10-01 for which we intend to seek NRC endorsement.

We appreciate the NRC's position that NRC requirements do not govern the process used by an applicant to gather the information used to develop a PPE. We therefore understand your view that, since NEI 10-01, Revision 0, was limited to describing that process, the NRC cannot endorse it. However, we welcome the NRC's suggestion that if NEI expands upon the process guidance to develop a generic PPE without specific values for the parameters, the NRC could endorse the guidance. Therefore, we intend to develop a generic PPE to be included in a revision to NEI 10-01. This revision will also be fully responsive to all of the Requests for Additional Information contained in the attachment to your February 3 letter and incorporate additional industry insights gained over the past year—including guidance on how the PPE concept can be applied to small reactors. We intend to submit NEI 10-01, Revision 1, for NRC endorsement by no later than June 30, 2011.

We believe that the exchange of information between the industry and the NRC concerning NEI 10-01 has been useful and should improve the efficacy of the Early Site Permit Application process. We

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look forward to continued interaction with the NRC in this regard through the development and review of Revision 1 to NEI 10-01. If you have any questions, please do not hesitate to address them to me.

Sincerely,

A handwritten signature in black ink, appearing to read "Rod McCullum", written in a cursive style.

Rod McCullum

c: Mr. Brent Clayton, U.S. Nuclear Regulatory Commission
Mr. John S. Cushing, U.S. Nuclear Regulatory Commission