



NUCLEAR ENERGY INSTITUTE

5/31/2011

76FR 31381

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June 9, 2011

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Chief, Rules, Announcements, and Directives Branch
Division of Administrative Services
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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RULES AND DIRECTIVES
BRANCH
U.S. NRC

Subject: Docket ID NRC-2011-0119: Request for Comments: Draft Branch Technical Position (BTP) 8-8: "Onsite (Emergency Diesel Generators) and Offsite Power Sources Allowed Outage Time Extensions" - REQUEST FOR DELAY IN PUBLICATION

Project Number: 689

Dear Ms. Bladey:

On May 31, 2011, the NRC issued a Federal Register Notice (76FR31381) soliciting public comments on Revision 4 to chapter 8.1 of NUREG-0800 (Standard Review Plan). This revision issues a new Branch Technical Position (BTP) 8-8 entitled "Onsite (Emergency Diesel Generators) and Offsite Power Sources Allowed Outage Time Extensions." Public comments are due by June 30, 2011.

The purpose of BTP 8.8 is to provide guidance from a deterministic perspective for the review of license amendments that request one-time or permanent extensions of allowed outage times for emergency diesel generators and offsite power sources. The main item of concern in the new BTP is the expectation that as part of the license amendment request, licensees will add a supplemental AC power source to back up existing AC power sources. According to BTP 8-8, this change provides additional defense in depth based on the Staff's contention that the projected time for restoration of offsite power in the event of a station blackout (SBO) is greater than that assumed at the time the SBO rule was passed.

Putting aside any comments that NEI may have regarding the need for this change or the process that the Staff is using to implement it, NEI is concerned that this new branch technical position may be issued at an inappropriate time. In his March 23, 2011 letter to the Commission on Staff actions following the events in Japan, the NRC Executive Director for Operations stated that station blackout would be one of the regulatory issues that will be evaluated in the near term to identify

SUNSI Review Complete

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Template = ADM-013

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Ms. Cindy K. Bladey

June 9, 2011

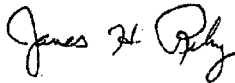
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"recommendations, as appropriate, for potential changes to inspection procedures and licensing review guidance..." We are concerned that it is not appropriate to issue this new branch technical position when there is a distinct possibility that this document may be changed again in the near future. Should that occur, licensees who request the associated licensing action in the interim may then have to modify any activities they may have undertaken in response to the Staff position. We would like to avoid this unnecessary burden on NRC stakeholders and Staff and therefore propose that the NRC delay publication of BTP 8-8 until the NRC team that is currently studying the Fukushima event completes its work.

In summary, NEI requests that the staff withdraw BTP 8-8 and issue the document for comment at a later time when the lessons learned from the Fukushima event have been identified, evaluated, and appropriate expectations included in the new BTP. The industry and NRC have both stated their intention to gain a deeper understanding of the events at Fukushima Daiichi and take the necessary actions to improve safety at our nuclear plants. Please allow the time necessary for this thoughtful process to take place.

If you have any questions, please feel free to contact me at 202.739.8137; jhr@nei.org. I look forward to receiving your response.

Sincerely,



James H. Riley

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