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August 29, 2011

76 FR 52995

(1)

Ms. Cindy K. Bladley
Chief, Rules, Announcements and Directives Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Request for a 30-day Extension to the Comment Period for Draft NRC Interim Staff Guidance, LR-ISG-2011-05, "Ongoing Review of Operating Experience" (*Federal Register* dated August 24, 2011; 76 FR 52995; Docket ID NRC-2011-0191)

Project Number: 689

Dear Ms. Bladley:

The subject *Federal Register* notice issued for public comment, a draft Interim Staff Guidance (ISG) titled "Ongoing Review of Operating Experience." Comments on the draft ISG were requested by September 23, 2011. The purpose of this letter is to request a 30-day extension to this comment period, which would result in a due date of October 23, 2011.

The draft ISG is intended to provide interim revisions to NUREG-1800, Revision 2, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants" (SRP-LR), clarify the staff's acceptance criteria and review procedures with respect to the ongoing review of operating experience to ensure the effectiveness of the license renewal aging management programs (AMPs)

As noted in the staff's August 16, 2011 letter, "Request for Public Comments on Draft License Renewal Interim Staff Guidance, LR-ISG-2011 "Ongoing Review of Operating Experience," Operating Experience (OE) is a plant program that is credited for license renewal. Given that most plants follow the Institute of Nuclear Plant Operations (INPO) guidelines for conduct of this program, it is important that we thoroughly understand the staff's concerns and incorporate any changes to either the AMPs or the OE program and coordinate with INPO as needed to ensure any issues are fully addressed in a manner that is both effective and efficient for daily plant operations.

NEI is coordinating industry comments on the draft ISG to ensure that the comments are of high quality, and that they reflect a consensus industry perspective. We believe that extending the comment period 30 days would provide the time necessary to more fully assess the content of the

SUNSI Review Complete

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draft LIS and arrive at a set of comments that are of value to the NRC staff. We also would like to request that the Industry and Staff meet in approximately 30-days to discuss any draft industry comments and to answer any questions the industry may have about implementation of the subject ISG.

We appreciate your consideration of this request and respectfully request timely feedback. If you have any questions or require additional information, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to be 'Julie Keys', with a stylized, flowing script.

Julie Keys

c: Mr. Brian E. Holian, NRR/DLR, NRC
Mr. Matthew J. Homiack, NRR/DLR/RARB, NRC
Anne Cottingham, Esq., NEI
NRC Document Control Desk