



NUCLEAR ENERGY INSTITUTE

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May 17, 2012

Ms. Amy E. Cubbage  
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:** Submittal of NEI 10-01, *Industry Guideline for Developing a Plant Parameter Envelope in Support of an Early Site Permit*, Revision 1 (Project No. 689, TAC Q00341)

References:

1. Letter, McCullum to Flanders, Submittal of NEI 10-01, Revision 0, *Industry Guideline for Developing a Plant Parameter Envelope in Support of an Early Site Permit*, March 26, 2010 (ML101050321)
2. Letter, Burton to McCullum, Request for Additional Information Related to NEI 10-01, *Industry Guideline for Developing a Plant Parameter Envelope in Support of an Early Site Permit* (Project No. 689, TAC Q00341), Revision 0, February 3, 2011 (ML103010115)
3. Letter, McCullum to Burton, 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), March 8, 2011 (ML110700144)

**Project Number: 689**

Dear Ms. Cubbage:

Attached, for your review, is Revision 1 of NEI 10-01 *Industry Guideline for Developing a Plant Parameter Envelope in Support of an Early Site Permit*. This revision addresses NRC comments (Reference 2) on our original submittal of NEI 10-01 (Reference 1) including the commitment made in response to these comments (Reference 3) to add "a generic PPE without specific values for the parameters" to the document. Attachment 1 to this letter contains the revised NEI 10-01. We are requesting NRC endorsement of this guidance document.

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May 23, 2012

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To aid in the NRC's review of this revision, Attachment 2 is a table that summarizes our disposition of the comments received. It should be noted that a number of these responses address NRC comments on the level of detail with which the guidance document cites applicable references. While we appreciate the NRC's diligence in this area, we have concluded that the replication of detailed references is not necessary to support the goal of the guidance—to instruct future applicants on how to develop a PPE—and would require frequent revisions to the guidance to assure such detailed references were kept up-to-date.

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 look forward to continued interaction with the NRC in this regard through the review and implementation 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 over a horizontal line.

Rod McCullum

c: Mr. Ryan Whited, NRO/DSEA/RENV, NRC  
Mr. John S. Cushing, NRO/DSEA/RENV, NRC  
NRC Document Control Desk