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Biff Bradley  
DIRECTOR  
RISK ASSESSMENT  
NUCLEAR GENERATION DIVISION

June 4, 2012

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

①

**Subject:** Request for a 45-day Extension to the Comment Period for Four Draft Regulatory Guides on Risk-Informed Decisions on Plant-Specific Licensing Basis Changes (*Federal Register* dated May 17, 2012; 77 FR 29391; Docket ID NRC-2012-0110)

**Project Number: 689**

Dear Ms. Bladey:

The subject *Federal Register* notice issued for public comment four draft regulatory guides regarding risk-informed licensing basis changes:

- DG-1285, "An Approach for Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," (proposed Revision 3 of Regulatory Guide 1.174)
- DG-1286, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Inservice Testing," (proposed Revision 1 of Regulatory Guide 1.175)
- DG-1287, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications" (proposed Revision 2 of Regulatory Guide 1.177)
- DG-1288, "An Approach for Plant-Specific Risk-Informed Decisionmaking for Inservice Inspection of Piping" (proposed Revision 2 of Regulatory Guide 1.178)

Comments on these draft regulatory guides were requested by June 29, 2012. The purpose of this letter is to request a 45-day extension to this comment period, which would result in a due date of August 13, 2012.

SUNSI Review Complete  
Template = ADM-013

E-RIDS = ADM-03  
Add = R. Carpenter (VGC1)  
M. Case (MSC)

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These draft regulatory guides collectively describe the approach that the NRC uses to review risk-informed licensing basis changes, with Regulatory Guide 1.174 describing the process in general and the others describing the process for specific applications that have been widely adopted by the industry. The major revisions to these documents deal with defense-in-depth, including expectations for defense-in-depth evaluations supporting risk-informed licensing applications. Defense-in-depth has proven to be a significant factor in the success of risk applications, and these changes require careful evaluation. Given the importance of these documents, coupled with the changes related to the key process of defense-in-depth evaluation, the industry needs additional time to thoroughly develop comments.

We appreciate your consideration of this request and respectfully request timely feedback. If you have any questions or require additional information, please contact me or Victoria Anderson, 202-739-8101, vka@nei.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Biff", followed by a stylized flourish that extends to the right and loops back under the name.

Biff Bradley

c: Mr. Robert G. Carpenter, RES/DE/RGDB, NRC  
Ms. Mary T. Drouin, RES/DRA/PRB, NRC  
Mr. Timothy J. McGinty, NRR/DPR, NRC  
Mr. Steven A. Laur, NRR/DRA/, NRC