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NUCLEAR ENERGY INSTITUTE

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September 9, 2013

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

Subject: NEI Comments on Draft Revision to NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition," Section 17.6, "Maintenance Rule." (*Federal Register* of August 8, 2013; 78FR48504-48506, Docket ID NRC-2013-0179).

Project Number: 689

Dear Ms. Bladey:

The subject *Federal Register* notice issued for public comment a draft revision to NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition," Section 17.6, "Maintenance Rule." On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)¹ appreciates the opportunity to provide comments on this draft revision to an important portion of the standard review plan.

In general, the draft revision appropriately reflects the content of relevant regulatory guidance supporting 10 CFR 50.65 (Maintenance Rule), and will support consistency in reviews of the scoping process. Comments regarding potential improvements in clarity are attached.

¹ The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

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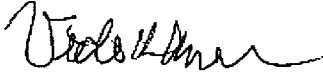
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E-RIDS= ADM-03
Add= J. DeYoung (JLDH)

J. Colacino (Jc1)

Ms. Cindy K. Bladey
September 9, 2013
Page 2

We appreciate the NRC staff's consideration of these comments. If you have any questions concerning the attached comments, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Victoria K. Anderson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Victoria K. Anderson

Attachment

c: Mr. Jonathan L. DeGange, NRO/DARR/APOB, NRC
Mr. Tim J. Kobetz, NRR/DIRS/IRIB, NRC

Attachment: Detailed Comments on Draft SRP 17.6, Rev. 2

Affected Section	Comment/Basis	Recommendation
1. I. Areas of Review, Item 9	Referenced table in the FSAR will always be in Section 13.4	Change 13.x to 13.4-x.
2. III. Review Procedures, Item 1.B, last paragraph (page 17.6-6)	There are parentheses around RISC in one place.	Delete parentheses.
3. III. Review Procedures, Item 1.E, first paragraph	It would be helpful to the COL applicant and COL holder to have a note that indicates that SSCs can be moved out of the HSS category.	Add the following at the end of the paragraph: "Note that with sufficient justification, the MR program may subsequently remove SSCs from the HSS category."
4. III. Review Procedures, Item 6 first paragraph, 2 nd sentence	It would be helpful to the COL applicant and COL holder to have a note that indicates that SSCs can be moved out of the HSS category.	Insert 'initially', so that the phrase reads: "with all RAP SSCs initially categorized as having HSS,"
5. III. Review Procedures, Item 6, first paragraph, last sentence	It would be helpful to the COL applicant and COL holder to have a note that indicates that SSCs can be moved out of the HSS category.	Insert 'initially', so that the phrase reads: "are included within the MR scope, initially in the HSS category".
6. III. Review Procedures, Item 9, end of first paragraph	Referenced table in the FSAR will always be in Section 13.4	Change 13.x to 13.4-x.