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April 23, 2015

Dr. Rajender Auluck
Senior Project Manager
Policy and Support Branch
Japan Lessons-Learned Project Directorate
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Transmittal of NEI 13-02, *Industry Guidance for Compliance with Order EA-13-109*, Revision 1, April 2014

Project Number: 689

Dear Dr. Auluck:

The Nuclear Energy Institute (NEI),¹ on behalf of the nuclear industry, is pleased to submit to the U.S. Nuclear Regulatory Commission (NRC) NEI 13-02, *Industry Guidance for Compliance with Order EA-13-109*, Revision 1, April 2015. The information contained in this guidance will be used by NRC licensees to implement the requirements of Phase 2 of NRC Order EA-13-109, *Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions*, June 6, 2013. The NRC previously endorsed industry guidance for implementing Phase 1 of EA-13-109 on November 14, 2013 (see JLD-ISG-2013-02). We request that the NRC endorse NEI 13-02, Revision 1.

Draft Revision 0E2 of NEI 13-02 was transmitted to NRC on December 10, 2014, requesting review and endorsement. We modified Revision 0E2 based on feedback provided by NRC staff, as documented in our comment letter² on the draft Interim Staff Guidance (JLD-ISG-2015-01, March 2015).

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.

² Letter, Steven P. Kraft (NEI) to Cindy K. Bladey (USNRC), *Nuclear Industry Comments on U.S. Nuclear Regulatory Commission Draft Interim Staff Guidance JLD-ISG-2015-01, "Compliance with Phase 2 of Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions,"* 80 Fed. Reg. 12649, March 10, 2015; Docket ID: NRC-2015-0048, April 9, 2015.

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In conclusion, we reiterate our appreciation for the constructive engagement by the NRC staff in developing the guidance for implementation of Phase 2 of EA-13-109. We look forward to continuing this engagement as the industry and NRC move to the next steps of Order EA-13-109 implementation. NEI also wants to recognize the vital contributions of the Boiling Water Reactor Owners' Group to this effort.

If you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "SP Kraft".

Steven P. Kraft

Attachment

c: Mr. William D. Reckley, NRR/JLD/JPSB, NRC