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September 2, 2014

Ms. Brenda P. Miles (T-5 F53)
Acting NRC Clearance Officer
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Request for Public Comments on the NRC's Request for OMB Approval for Renewal of Information Collection Titled, "Voluntary Reporting of Performance Indicators" Docket No.: NRC-2014-0157

Project Code: 689

Dear Ms. Miles:

On behalf of the nuclear energy industry, the Nuclear Energy Institute provides the following responses to the four questions presented in the request for public comments published in the *Federal Register* on July 2, 2014.

Question 1: Is the proposed collection of information necessary for the NRC to properly perform its functions? Does the information have practical utility? Response: Yes to both parts. The industry recognizes that submittal of performance indicator information is necessary for NRC to properly implement the Reactor Oversight Process. The NRC uses this performance indicator data and other inputs to help decide on the level of regulatory response appropriate to the licensee's performance at a site.

Question 2: Is the burden estimate accurate? Response: Yes. The NRC's estimates are consistent with our own estimates of the burden imposed by the subject performance indicator data reporting.

Question 3: Is there a way to enhance the quality, utility and clarity of the information to be collected? Response: None identified. NEI and other representatives of the U.S. nuclear industry meet with counterparts at the NRC several times per year to discuss aspects of the Reactor Oversight Process, including the reporting of performance indicator data. These meetings provide adequate opportunity to discuss industry concerns with or suggestions to improve the quality, utility and clarity of the information collected.

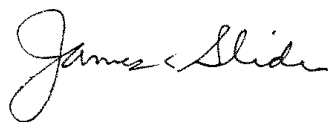
Question 4: How can the burden of the information collection be minimized, including the use of automated collection techniques or other forms of information technology? Response: The data collection and submittal process appears to be as automated and efficient as it can be. To the best of our knowledge, all affected

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power reactor licensees utilize the NRC's process for electronic submission of performance indicator information. This process appears to present as little burden as practical given the NRC's legal requirements for submittal of official information that potentially affects regulatory decisions.

If you have any questions in this matter, please contact me without hesitation.

Sincerely,

A handwritten signature in cursive script that reads "James E. Slider". The signature is written in black ink and is positioned above the printed name.

James E. Slider