**Request for Extension** 

JERRY W. HIATT, CHP Certified Health Physicist Sr. Project Manager

1201 F Street, NW, Suite 1100 Washington, DC 20004 P: 202.739.8171 jwh@nei.org nei.org



July 6, 2015

Ms. Carolyn Lauron Office of New Reactors U.S. Nuclear Regulatory Commission Washington, DC 20555-0001 Mr. Nishka Devaser Office of New Reactors U.S. Nuclear Regulatory Commission Washington, DC 20555-0001

**Subject:** Request for Extension of Public Comment Period on the Advanced Notice of Proposed Rulemaking (ANPR) for 10 CFR 50, Appendix I, "*Numerical Guides for Design Objectives and Limiting Conditions for Operation to Meet the Criterion "As Low as is Reasonably Achievable" for Radioactive Material in Light-Water-Cooled Nuclear Power Reactor Effluents*" NRC-2014-0044; (FR Notice 2015-25237)

## Project Number: 689

Dear Ms. Lauron and Mr. Devaser:

The subject Federal Register Notice (FRN) issued for public comment on 10 CFR50, Appendix I was published on May 4, 2015. Comments on ANPR are requested by September 1, 2015. The purpose of this letter is to request a 60-day extension to this comment period.

As stated in the FRN, the purpose of the document is to obtain input from stakeholders on the development of a regulatory basis for the NRC's regulations governing radioactive effluents from nuclear power plants. The regulatory basis would support potential changes to better align the NRC regulations governing dose assessments for radioactive effluents from nuclear power plant operations with the most recent terminology and dose-related methodology published by the International Commission on Radiological Protection (ICRP) contained in the ICRP Publication 103 (2007).

As such the proposed rule will impact all operating commercial nuclear power reactors and those reactors entering the decommissioning phase, reactors under construction, and advanced designs (e.g., SMR's). Within the ANPR the NRC is requesting input on four specifically defined issues and on the overall cumulative impact of the regulations. Within the four Issues there are 12 options that need to be assessed and a total of 20 questions which must be addressed by a relatively small cadre of industry technical experts experienced in effluents, dose assessments, and environmental monitoring. Several of the questions (e.g., cost evaluations, PWR vs. BWR impacts, etc.) will require input from multiple sources and significant amounts of time dedicated to research.

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The additional time being requested will enable us to gather and consolidate input from industry and supporting organizations in a more effective manner. A extension will also allow the incorporation of any potentially new information presented during a planned NRC public meeting now tentatively being scheduled for August within 30 days of the current due date.

We appreciate your consideration of this request. If you have any questions or require additional information, please contact me at jwh@nei.org or 202-739-8171.

Sincerely,

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Jerry W. Hiatt, CHP