

**From:** Brenda G Kovarik <bgkovarik@aep.com>  
**Sent:** Wednesday, December 16, 2015 3:34 PM  
**To:** Philpott, Stephen  
**Cc:** Bowman, Eric; Gallagher, Carol  
**Subject:** [External\_Sender] RE: Comments on NRC's JLD-ISG-2012-01 Draft Revision 1

Mr. Philpott

In response to your request for clarification on the Dec 7 comment submission.

The intended change to Comment 1 was in the last sentence of the comment.

The intended comment is

**1. Comment to:**

main body, Page 5, paragraph titled "Implementation."

**Comment:**

Add the following sentence: "Licensees that, prior to the issuance date of this ISG, have confirmed compliance with Order EA-12-049 in accordance with JLD-ISG-2012-01, Revision 0, dated August 29, 2012, (ML12229A174), and NEI 12-06 Revision 0, dated August 21, 2012, (ML12242A378), and have received a Safety Evaluation documenting the NRC staff's determination that the licensee's integrated plan will adequately address the requirements of Order EA-12-049, are considered to have provided an acceptable alternative to the requirements of this ISG.

**Basis for Comment:**

Licensees that have implemented an integrated plan that has been determined to be acceptable by the NRC staff have already demonstrated compliance with EA-12-049. These licensees have therefore already provided an "acceptable alternative" to the requirements in the revised ISG and revised NEI guide.

Thank you and my apologies for the confusion created by this item.

Brenda G. Kovarik

CNP phone 269-697-5185

[bgkovarik@aep.com](mailto:bgkovarik@aep.com)

S&L phone 312-269-2328

[brenda.g.kovarik@sargentlundy.com](mailto:brenda.g.kovarik@sargentlundy.com)

---

**From:** Philpott, Stephen [<mailto:Stephen.Philpott@nrc.gov>]  
**Sent:** Wednesday, December 16, 2015 1:26 PM  
**To:** Brenda G Kovarik  
**Cc:** Bowman, Eric; Gallagher, Carol  
**Subject:** Comments on NRC's JLD-ISG-2012-01 Draft Revision 1

This is an EXTERNAL email. STOP. THINK before you CLICK links or OPEN attachments.

---

Good afternoon Ms. Kovarik,

We have received two comment submissions from you during the public comment period for our Interim Staff Guidance document JLD-ISG-2012-01 Draft Revision 1, which I would like to clarify. It appears that your first comment was submitted on Dec 3, and the second on Dec 7. The Dec 7 comment includes a note stating that it is an update to your Dec 3 comment, and that "Comment 1 has been updated for clarification." However, when we review both sets of comments, they appear to be identical. Could you please confirm what changes were made to Comment 1, or how you intended Comment 1 to read?

The comment period closed on Dec 10, and the comments have already been processed, though the Dec 7 comment submission has not yet been released. So, if you could provide this clarification at your earliest convenience, it would be greatly appreciated.

Thank you for your comments and for your assistance with this clarification.

Kind regards,

Steve Philpott  
Japan Lessons Learned Division  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
phone: 301-415-2365  
e-mail: [Stephen.Philpott@nrc.gov](mailto:Stephen.Philpott@nrc.gov)