

**SUSAN PERKINS-GREW**

*Sr. Director, Nuclear Security & Incident Preparedness*

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March 09, 2017

Mr. James W. Andersen  
Director, Division of Security Policy  
Nuclear Security and Incident Response  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Industry Comments on DG-5039, Draft Revision 1 of Regulatory Guide 5.69, "Guidance for the Application of Radiological Sabotage Design-Basis Threat in the Design, Development, and Implementation of a Physical Security Program that Meets 10 CFR 73.55 Requirements"

**Project Number: 689**

Dear Mr. Andersen:

The Nuclear Energy Institute (NEI)<sup>1</sup> and the industry have reviewed the subject draft regulatory guide, dated January 2017, and are providing the attached comments for NRC staff consideration. The comments contain Safeguards Information; for this reason, the attachment will be encrypted and sent separately to Mr. James Vaughn of your office.

If necessary, we are available to meet with the staff to discuss our comments and answer related questions.

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<sup>1</sup> 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.

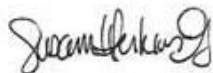
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Questions concerning the attached comments or a related meeting with industry representatives should be directed to Mr. David Young (202-739-8127 or [dly@nei.org](mailto:dly@nei.org)).

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Perkins-Grew". The signature is written in a cursive, flowing style.

Susan H. Perkins-Grew

Attachment (transmitted separately)

c: Mr. Steven West, NSIR, NRC  
Mr. Russell Felts, NSIR/DSP, NRC  
Ms. Marissa Bailey, NSIR/DSO, NRC  
NRC Document Control Desk