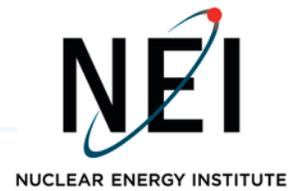


JAMES E. SLIDER
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March 15, 2017

Ms. Andrea M. Johnson
Office of New Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments on Draft Implementation Plan to Ensure NRC Staff Readiness for AP1000 Operations, Revision 0

Project Number: 689

Dear Ms. Johnson:

The Nuclear Energy Institute¹ appreciates your invitation to provide comments on the NRC's Draft Implementation Plan to Ensure NRC Staff Readiness for AP1000 Operations ("Readiness"). Our detailed comments are provided in the attachment to this letter.

Our primary concern with the document is the proposed approach to dispositioning greater-than-green construction-related findings that remain open when the 10CFR 52.103(g) finding is made. The Readiness document indicates the staff will re-map the construction finding to a cornerstone of the operational Reactor Oversight Process (ROP). This overlooks the importance of understanding that the construction regime and the operating regime are fundamentally different. The staff's proposed approach would blend a significance determination made under the construction regime for a problem arising during construction with the response framework of the operational ROP that applies to and is based on evaluating performance of an operating plant. We suggest the NRC close the construction-related finding according to the requirements of the applicable construction-related inspection procedure. If the NRC finds it necessary to carry construction-related findings over to the operating environment, NEI believes the NRC should use the existing Action Matrix deviation process to recognize that construction-related findings and operations-related findings are not additive in the ROP Action Matrix.

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.

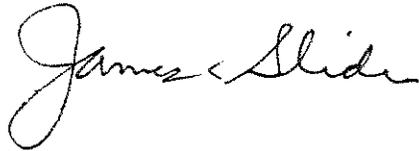
Ms. Andrea M. Johnson

March 14, 2017

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If you have any questions, please contact me at jes@nei.org, or 202-739-8015.

Sincerely,

A handwritten signature in black ink that reads "James E. Slider". The signature is written in a cursive style with a large, looping initial "J".

James E. Slider

Attachment