

**Timothy Riti**

*Senior Project Manager, Regulatory Affairs*  
1201 F Street, NW, Suite 1100  
Washington, DC 20004  
P: 202.739.8137  
txr@nei.org



April 9, 2020

Mr. Shawn Williams  
Senior Project Manager  
Division of Operating Reactor Licensing, LPL 2-1  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Submittal of NEI 15-03, Revision 3, "Licensee Actions to Address Nonconservative Technical Specifications"

**Project Number: 689**

Dear Mr. Williams:

On behalf of the Nuclear Energy Institute's (NEI)<sup>1</sup> members (hereinafter referred to as industry), we submit the attached NEI 15-03, "Licensee Actions to Address Nonconservative Technical Specifications," Revision 3 for U.S. Nuclear Regulatory Commission review and endorsement. Revision 3 contains changes from discussions that occurred at a public meeting held on Oct 17, 2019 (ML19268A117) to address exceptions from revision 2 contained in Draft Regulatory Guide (DG-1351), "Dispositioning of Technical Specifications that are Insufficient to Ensure Plant Safety" (ML19268B567).

We appreciate the NRC's consideration of the revised document and welcome the opportunity to further discuss this revision in more detail to assist the NRC in its review and endorsement process. If you have any questions or require additional information, please contact me at 202-739-8137 or [txr@nei.org](mailto:txr@nei.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy Riti", is written over a light blue horizontal line.

Timothy Riti

Attachment

c: Mr. Craig Erlanger, NRR/DORL, NRC  
Mr. Michael Markley, NRR/DORL/LPL2-1  
NRC Document Control Desk

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<sup>1</sup> The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect and engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations involved in the nuclear energy industry.