

**APPENDIX B**

**DISPOSITION OF NEI COMMENTS**

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## **B.1. INTRODUCTION**

In response to the NRC Request for Public Comments on the Draft Guidance Documents for License Renewal (65 FR 53047, August 31, 2000), the Nuclear Energy Institute reviewed the documents and provided written comments on October 13, 2000 (see Section B.4, References) on the draft guidance documents and for the specific questions posed in the Federal Register notice. In addition, NEI provided additional comments on October 26, 2000 (see Section B.4, References) and November 08, 2000 (see Section B.4, References) on the same documents. Comments were made on the draft Standard Review Plan, the GALL report, and the draft Regulatory Guide. Changes were identified that were necessary to NEI 95-10, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 – The License Renewal Rule," Revision 2. About 723 written comments were received from NEI.

## **B.2. EVALUATION AND DISPOSITION OF COMMENTS**

The tables B.2.1 through B.2.16, at end of Appendix B, contain comments received from NEI in accordance with the references provided in Section B.4.

The column heading, "Comment Number," is primarily intended to provide the source of the comment, meaning the letter or meeting from which the comment was obtained (see Section B.4, References), and to indicate whether the comment was originally numbered when submitted. For example, NEI-1 indicates that the comment was made by NEI and the "1" distinguishes this comment from all other NEI comments; however, the "NEI" in front of the number indicates that this comment was not originally numbered when submitted by NEI. A comment number prefixed by either a "G" or "S" indicates that the comment is on the GALL report or Standard Review Plan for License Renewal (SRP-LR), respectively. For example:

- G-IVD1-6 indicates a comment on the GALL report, Chapter IV, Section D1.
- G-XI-M5-1 indicates a comment on the GALL report, Chapter XI, Aging Management Program M5.
- S3.4-2 indicates a comment on the SRP-LR, Section 3.4.
- SA.1-3 indicates a comment on the SRP-LR, Appendix A, Section A.1.
- NEI-1 indicates a comment for which NEI did not actually supply a comment number. NRC numbered the NEI comments consecutively. This applies to comments NEI-1 through NEI-19.
- A single number (1 through 7) indicates a NEI comment on NEI 95-10 for which NEI did supply a comment number, which is shown as the single digit.

The abbreviations used in this appendix are listed in the front matter of this NUREG. All comment numbers use original NEI comment numbers if provided. Traceability between the comments in this Appendix B and the references in Section B.4 is indicated in Section B.3 and is established for all comments. In Tables B.2.8, B.2.10, B.2.12-5, B.2.15, and B.2.16, under the column heading "Item Number," the numbers on the first line for a line item are those from Section B.3 to establish traceability since the origins at comments in these tables are less direct than those in other tables. For example B.3.2 would indicate that Section B.3, item 2, is the source of that comment, and B.3.2 would appear on the first line under the column heading "Item Number." The items on the second or subsequent lines for each line item under this column heading relate to the section of the document on which the listed comment was made. The references in Section B.4 provide the sources of all comments. For the tables B.2.1 through B.2.13, the comments are in alphanumerical order both for each appendix and for this overall appendix. However, Tables B.2.14 through B.2.16 are only in alphanumerical order within each appendix. This is based on the combination of letters and numbers of each comment number as you move from left to right.

### **B.3. ORIGIN OF NEI COMMENTS**

1. All NEI Comments besides those described below

See Section B.4, Reference 1, Enclosure 3

2. Comments NEI-1 through NEI-5 in Table B.2.15

See Section B.4, Reference 1, Enclosure 2, pages 1 through 3

3. Comments NEI-6 through NEI-8 in Table B.2.15

See Section B.4, Reference 1, Enclosure 1, pages 1 through 3

4. Comments NEI-9 in Table B.2.15

See Section B.4, Reference 1, Enclosure 4, page 1

5. Comments NEI-10 through NEI-13 in Table B.2.15

See Section B.4, Reference 1, Enclosure 5, page 1

6. Comments G X-1, G XM1-1, G X.S1-1, and G X.S1-2 in Table B.2.8

See Section B.4, Reference 2

7. Comments S-1-1 through S-1-5; S-2-1 in Table B.2.10

See Section B.4, Reference 1, Enclosure 3, SRP-LR Comments on Chapters 1 and 2, page 1

8. Comments S-3.5-1 through S-3.5-27 in Table B.2.12-5

See Section B.4, Reference 1, Enclosure 3, SRP-LR Comments on Chapter 3, pages 20 through 27

9. Comments 1 through 7 in Table B.2.15

See Section B.4, Reference 1, for Enclosure 5, pages 1 and 2)

10. Comments NEI-14 through NEI-19 in Table B.2.16

See Section B.4, Reference 3

#### **B.4. REFERENCES**

Letter from Alex Marion, Director, Licensing and Programs, Nuclear Generation, Nuclear Energy Institute, to Annette Vietti-Cook, Secretary of the Commission, U.S. Nuclear Regulatory Commission, concerning NRC Request for Public Comments on the Draft Guidance Documents for License Renewal (65 FR 53047, August 31, 2000), October 13, 2000.

Letter from Alex Marion, Director, Licensing and Programs, Nuclear Generation, Nuclear Energy Institute, to Annette Vietti-Cook, Secretary of the Commission, U.S. Nuclear Regulatory Commission, concerning NRC Request for Public Comments on the Draft Guidance Documents for License Renewal (65 FR 53047, August 31, 2000), October 26, 2000.

Meeting between NRC staff and NEI representatives on industry's comments on Chapters 2, 4, and 11 of the GALL report based on the NRC Request for Public Comments on the Draft Guidance Documents for License Renewal (65 FR 53047, August 31, 2000), November 8, 2000.