



NUCLEAR ENERGY INSTITUTE

Alexander Marion
SENIOR DIRECTOR, ENGINEERING
NUCLEAR GENERATION DIVISION

December 1, 2005

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

10/19/05

70 FR 60859

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RULES AND DIRECTIVES
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SUBJECT: "Proposed Generic Communication: Post-Fire Safe-Shutdown
Circuit Analysis Spurious Actuations," 70FR60859,
October 19, 2005

The Nuclear Energy Institute (NEI)¹ is submitting this request for a 45-day extension to the comment period for the subject proposed generic communication. We recently held a meeting of the NEI Fire Protection Working Group and believe the following information will be needed to provide appropriate comments on the assumptions and bases noted in the proposed communication:

1. Assessment of the safety significance of multiple sequential and cumulative failures.
2. Evaluation of the industry test results and interviews with the industry project team.
3. Evaluation of the NUREG/CR-6776.
4. Assessment of NRC/licensee documentation associated with prior NRC staff positions and practices related to safe-shutdown circuit analysis.

The comprehensive nature and extensive background associated with the subject of the NRC proposed communication is such that credible and constructive comments from the nuclear energy industry cannot be provided by the requested date noted in the Federal Register. We thank you for your consideration of this request.

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

SESP Better Compliance


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Chief, Rules and Directives Branch
December 1, 2005
Page 2

If you have any questions regarding this request, please contact me at
202.739.8080; am@nei.org.

Sincerely,

A handwritten signature in cursive script that reads "Alexander Marion".

Alexander Marion

c: Mr. Gary M. Holahan
Mr. Michael D. Tschiltz
Mr. Theodore R. Quay
Mr. Sunil D. Weerakkody