



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

March 8, 2006

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
One White Flint, North
11555 Rockville Pike
Rockville, Maryland 20852-2738

**TENNESSEE VALLEY AUTHORITY (TVA) - COMMENTS ON "RISK-INFORMED
CHANGES TO LOSS-OF-COOLANT ACCIDENT (LOCA) TECHNICAL
REQUIREMENTS (71 FR 4061 dated January 25, 2006)**

The NRC has published the subject proposed rulemaking to implement a voluntary, risk-informed alternative to the current requirements for analyzing the performance of emergency core cooling systems (ECCS) during LOCAs. In addition, the proposed rule would establish procedures and criteria for requesting changes in plant design and procedures based upon the results of the new analyses of ECCS performance during LOCAs. This rulemaking has been under development for several years, and is an important element of NRC's regulatory reform effort.

TVA has reviewed and endorses Nuclear Energy Institute (NEI) comments on this subject.

TVA appreciates the opportunity to comment. If you have any questions, please contact Rob Brown at (423) 751-7228.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Brown" with a stylized flourish underneath.

Glenn W. Morris
Manager, Corporate Nuclear Licensing
and Industry Affairs

cc: U. S. Nuclear Regulatory Commission
ATTN: Rulemaking and Adjudications Staff
Washington, D.C. 20555-0001

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