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OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

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,

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