

July 18, 2006

Mr. Alexander Marion, Senior Director  
Engineering  
Nuclear Energy Institute  
Suite 400  
1776 I Street, NW  
Washington, DC 20006-3708

SUBJECT: NUCLEAR ENERGY INSTITUTE (NEI) WHITE PAPER, "TREATMENT OF  
OPERATIONAL LEAKAGE FROM ASME CLASS 2 AND 3 COMPONENTS"  
(TAC NO. MD2300)

Dear Mr. Marion:

By letter dated May 4, 2006, Mr. Jack Roe, NEI Director of Operations Support, Nuclear Generation Division, submitted to the U.S. Nuclear Regulatory Commission (NRC), NEI white paper "Treatment of Operational Leakage from ASME [American Society of Mechanical Engineers] Class 2 and 3 Components," to document industry concerns with Appendices C.11 and C.12 in the NRC guidance on flaw evaluation and operational leakage. This NRC guidance is published in Regulatory Issue Summary 2005-20, "Revision to Guidance Formerly Contained in NRC Generic Letter 91-18, 'Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability.'" The NRC staff understands that the industry is concerned that use of NRC guidance on flaw evaluation and operational leakage may cause unnecessary plant shutdowns.

The NRC staff is interested in meeting with industry representatives to discuss a possible revision to the current guidance. Arrangements with NEI for a meeting date are underway. The NRC staff is interested in providing guidance that will not lead to unnecessary plant shutdowns, while ensuring that safety is maintained at plants experiencing operational leakage.

If you have any questions regarding this matter, I may be reached at 301-415-1774.

Sincerely,

**/RA/**

Michelle C. Honcharik, Project Manager  
Special Projects Branch  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

Project No. 689

cc: See next page

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