



Biff Bradley
DIRECTOR
RISK ASSESSMENT
NUCLEAR GENERATION DIVISION

12/29/2011
76FR 81998

February 1, 2012

Ms. Cindy K. Bladey
Chief, Rules, Announcements and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

RECEIVED

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RULES & DIRECTIVES
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Subject: Request for a 90-day Extension to the Comment Period for Draft NUREG-CF-7114, "Methodology for Low Power/Shutdown Fire PRA" (*Federal Register* dated December 29, 2011; 76 FR 81998; Docket ID NRC-2011-0295)

Project Number: 689

Dear Ms. Bladey:

The subject *Federal Register* notice issued for public comment, a draft NUREG titled "Methodology for Low Power/Shutdown Fire PRA." Comments on this draft NUREG were requested by March 1, 2012. The purpose of this letter is to request a 90-day extension to this comment period, which would result in a due date of May 30, 2012.

This draft NUREG, which discusses methodologies for development of probabilistic risk assessments (PRAs) for internal fire events during low power and shutdown (LPSD) operations, branches out into operating modes for which there is little modeling experience, and notably does so for Fire PRA, a hazard group for which modeling method evolution is still underway. Thus, the technical content of this document is extensive, and will require careful review by industry experts in these areas. Additionally, this methodology could appreciably impact the expectations for modeling risk due to internal fires during LPSD conditions at plants which have implemented, or will implement, National Fire Protection Association Standard 805; it is therefore imperative that the approaches outlined in this NUREG are reviewed in detail. Given the importance of this document, coupled with the extensive technical detail, the industry would be better able to develop beneficial comments with this additional time.

SUNSI Review Complete

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F. Gonzalez (Feg)

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We appreciate your consideration of this request and respectfully request timely feedback. If you have any questions or require additional information, please contact me or Victoria Anderson, 202-739-8101, vka@nei.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Biff", followed by a stylized, elongated flourish that loops back to the left.

Biff Bradley

c: Mr. Mark H. Salley, RES/DRA/FRB, NRC
Mr. Felix E. Gonzalez, RES/DRA/FRB, NRC