

2012 JUN -4 PM 5:05



RECEIVED

5/17/2012

77FR 29391

Biff Bradley
DIRECTOR
RISK ASSESSMENT
NUCLEAR GENERATION DIVISION

June 4, 2012

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



Subject: Request for a 45-day Extension to the Comment Period for Four Draft Regulatory Guides on Risk-Informed Decisions on Plant-Specific Licensing Basis Changes (*Federal Register* dated May 17, 2012; 77 FR 29391; Docket ID NRC-2012-0110)

Project Number: 689

Dear Ms. Bladey:

The subject *Federal Register* notice issued for public comment four draft regulatory guides regarding risk-informed licensing basis changes:

- DG-1285, "An Approach for Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," (proposed Revision 3 of Regulatory Guide 1.174)
- DG-1286, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Inservice Testing," (proposed Revision 1 of Regulatory Guide 1.175)
- DG-1287, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications" (proposed Revision 2 of Regulatory Guide 1.177)
- DG-1288, "An Approach for Plant-Specific Risk-Informed Decisionmaking for Inservice Inspection of Piping" (proposed Revision 2 of Regulatory Guide 1.178)

Comments on these draft regulatory guides were requested by June 29, 2012. The purpose of this letter is to request a 45-day extension to this comment period, which would result in a due date of August 13, 2012.

SUNSI Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add = R. Carpenter (rgc1)
m. Case (MSC)

Ms. Cindy K. Bladey
June 4, 2012
Page 2

These draft regulatory guides collectively describe the approach that the NRC uses to review risk-informed licensing basis changes, with Regulatory Guide 1.174 describing the process in general and the others describing the process for specific applications that have been widely adopted by the industry. The major revisions to these documents deal with defense-in-depth, including expectations for defense-in-depth evaluations supporting risk-informed licensing applications. Defense-in-depth has proven to be a significant factor in the success of risk applications, and these changes require careful evaluation. Given the importance of these documents, coupled with the changes related to the key process of defense-in-depth evaluation, the industry needs additional time to thoroughly develop comments.

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 horizontal stroke that loops back under the name.

Biff Bradley

c: Mr. Robert G. Carpenter, RES/DE/RGDB, NRC
Ms. Mary T. Drouin, RES/DRA/PRB, NRC
Mr. Timothy J. McGinty, NRR/DPR, NRC
Mr. Steven A. Laur, NRR/DRA/, NRC