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January 29, 2014

Mr. Michael E. Mayfield
Director, Division of Advanced Reactors and Rulemaking
Office of New Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Submittal of NEI 96-07, Appendix C, *Guideline for Implementation of Change Processes for New Nuclear Plants Licensed Under 10 CFR 52*, Revision 0

Project Number: 689

Dear Mr. Mayfield:

Attached for NRC review is Revision 0 of NEI 96-07, Appendix C, *Guideline for Implementation of Change Processes for New Nuclear Plants Licensed Under 10 CFR 52*. This appendix supplements guidance in NEI 96-07, Revision 1, on the 10 CFR 50.59 change control process that the NRC has endorsed in Regulatory Guide 1.187. The attached revision reflects resolution of NRC comments on Appendix C, dated December 5, 2013, consistent with discussions in public meetings with the NRC staff over the past year and the requirements of 10 CFR Part 52. Also attached is a table that provides industry responses to the NRC comments.

We request NRC endorsement of NEI 96-07, Appendix C, in a regulatory guide. To support the lead plants under construction, we request a response to this letter indicating that Appendix C is consistent with the staff's views and is acceptable for use while a regulatory guide is developed.

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We appreciate the NRC staff's thorough review of Appendix C and the opportunity to resolve change process issues unique to the construction phase. If there are any questions on this matter, please contact me or Kati Austgen (202.739.8068; kra@nei.org).

Sincerely,

A handwritten signature in black ink, appearing to read "RJB", with a stylized flourish at the end.

Russell J. Bell

Attachments

c: Mr. Frank M. Akstulewicz, NRO/DNRL, NRC
Mr. Michael C. Cheok, NRO/DCIP, NRC
Mr. Joseph Colaccino, NRO/DARR/APOB, NRC
Mr. Earl R. Libby, NRO/DARR/APOB, NRC
Ms. Lynn A. Mrowca, NRO/DSRA/SPRA, NRC
NRC Document Control Desk