

# PUBLIC SUBMISSION

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**Docket:** NRC-2008-0332  
Performance-Based ECCS Cladding Acceptance Criteria

**Comment On:** NRC-2008-0332-0060  
Performance-Based Emergency Core Cooling Systems Cladding Acceptance Criteria

**Document:** NRC-2008-0332-DRAFT-0074  
Comment on FR Doc # 2014-05562

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## Submitter Information

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Washington, DC, 20004  
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## General Comment

March 25, 2014

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 75-Day Extension of the Public Comment Period for Performance-Based Emergency Core Cooling Systems Cladding Acceptance Criteria (Federal Register Vol. 79, No. 56, 16106, dated March 24, 2014; Docket ID NRC-2008-0332)

Project Code: 689

Dear Ms. Bladey:

On behalf of the nuclear energy industry, the Nuclear Energy Institute submits the following request for consideration by the U.S. Nuclear Regulatory Commission (NRC) staff. Specifically, we request a 75-day extension of the public comment period for the proposed Performance-Based Emergency Core Cooling Systems

(ECCS) Cladding Acceptance Criteria (Federal Register Vol. 79, No. 56, 16106, dated March 24, 2014; Docket ID NRC-2008-0332). Comments were originally requested by June 9, 2014; the industry requests extending to August 21, 2014. Also, we specifically request the other two comment due dates (April 23 and May 23, 2014) be aligned to the requested single, final comment due date.

Cladding acceptance criteria development has progressed since 2000. Confirming plant-specific ECCS safety margins, both the PWROG and the BWROG supported the NRC's safety assessment that this topic is not safety-related. The number of issues addressed by this proposed rulemaking is significant as reflected in the magnitude of the four complicated technical documents included. The FRN contains significant material not previously seen by the industry or the general public. Answering the twelve NRC questions within the FRN and consolidating comments on the proposed rule, three related draft regulatory guides, and the implementation schedule for a hundred plants will put a strain on available resources responding to the staff's request.

Working with the NRC points of contact, the industry will be supporting a public meeting on April 29-30, 2014, that will clarify the contents of the proposed material and lead to discussions on the rule implementation. An aggressive industry schedule is projected to provide comments within the requested extension period. The milestones on this schedule reflect the time necessary to digest the rulemaking package, gain consensus among a wide variety of stakeholders, craft the response, obtain appropriate reviews/approvals, and deliver a meaningful response by August 21, 2014.

If you have any questions or require additional information, please contact me.

Sincerely,

Gordon Clefton  
Senior Project Manager, Engineering & Operations Support

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## Attachments

03-25-14\_NRC\_Request for Extension of the Comment Period for Performance-Based ECCS Cladding Acceptance Criteria

March 25, 2014

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Chief, Rules, Announcements, and Directives Branch  
Office of Administration  
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Dear Ms. Bladey:

On behalf of the nuclear energy industry, the Nuclear Energy Institute<sup>1</sup> submits the following request for consideration by the U.S. Nuclear Regulatory Commission (NRC) staff. Specifically, we request a 75-day extension of the public comment period for the proposed Performance-Based Emergency Core Cooling Systems (ECCS) Cladding Acceptance Criteria (*Federal Register* Vol. 79, No. 56, 16106, dated March 24, 2014; Docket ID NRC-2008-0332). Comments were originally requested by June 9, 2014; the industry requests extending to August 21, 2014. Also, we specifically request the other two comment due dates (April 23 and May 23, 2014) be aligned to the requested single, final comment due date.

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<sup>1</sup> The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

Ms. Cindy K. Bladey

March 25, 2014

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If you have any questions or require additional information, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gordon Clepton', with a stylized, cursive script.

Gordon Clepton

References:

- 1: *Federal Register* Vol. 79, No. 56, 16106, dated March 24, 2014; Docket ID NRC-2008-0332
  - 2: DG-1261, Conducting Periodic Testing for Breakaway Oxidation Behavior (ML12284A324)
  - 3: DG-1262, Testing for Post Quench Ductility (ML12284A325)
  - 4: DG-1263, Establishing Analytical Limits for Zirconium-Based Alloy Cladding (ML12284A323)
- c: Mr. Paul M. Clifford, R-I/DNMS, NRC  
Ms. Tara Inverso, NRR/DPR/PRB, NRC