

From: [LANDIS, Raymond](#)
To: [Goldberg, Paul](#)
Subject: FW: Part 37 Enforcement Guidance Memorandum
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Raymond L Landis
Senior Project Manager, Security

Nuclear Energy Institute
1201 F Street NW, Suite 1100
Washington, DC 20004
www.nei.org

P: 202.739.8011
F: 202.533.0122
M: 202.247.5824
E: rl@nei.org

From: LANDIS, Raymond
Sent: Wednesday, January 15, 2014 12:48 PM
To: Giantelli, Adelaide
Subject: Part 37 Enforcement Guidance Memorandum

Adelaide,

At least one site has received word from regional NRC that an Enforcement Guidance Memorandum (EGM) would be coming out to address Large Equipment.

I am hoping we get the opportunity to engage on what is defined as Large Equipment.

I would suggest the following language that I drafted into a letter to the NRC from NEI. I am holding that letter pending where we land with the EGM.

The second statement below is from same draft letter and is included here just so you can appreciate the magnitude of the issue.

[1] For the purposes of this exemption "Large Equipment" should be considered to be equipment with a weight $\geq 2,000$ Kilograms (4,409.25 Pounds) not containing discrete sources or spent ion exchange resin (e.g., steam generators, steam dryers, turbine rotors, reactor vessel heads).

[1] Industry survey for Large Equipment was conducted in December 2013 with the following results – With 54 sites responding (84%) there are 33 of 54 (61%) indicating the expectation of maintaining Large Equipment (i.e., steam generators, steam dryers, turbine rotors, reactor vessel heads) on site outside the Protected Area in excess of the Part 37 Compliance Date of March 19, 2014.

Raymond L Landis
Senior Project Manager, Security

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E: rl@nei.org



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