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50-366 50-364 50-425

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U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555-0001

Joseph M. Farley Nuclear Plant; Edwin I. Hatch Nuclear Plant
Vogtle Electric Generating Plant
Proposed Performance-Based Emergency Core Cooling Systems
Cladding Acceptance Criteria

Ladies and Gentlemen:

Southern Nuclear Operating Company (SNC) 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; SNC 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 Pressurized Water Reactor Owners Group (PWROG) and the Boiling Water Reactor Owners Group (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 Federal Register Notice (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, please contact Ken McElroy at (205) 992-7369.

Respectfully submitted,



C. R. Pierce
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CRP/JLS/lac

cc: Southern Nuclear Operating Company
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RType: CFA04.054; CHA02.004; CVC7000

U. S. Nuclear Regulatory Commission
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