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August 19, 2014

Mr. Jack R. Davis
Director, Mitigating Strategies Directorate
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Beyond Design Basis Change Process

Project Number: 689

Dear Mr. Davis:

The Nuclear Energy Institute (NEI)¹ and an industry task force have developed and are seeking NRC endorsement of the attached technical position which illustrates the protocol for addressing changes to the physical plant, procedures and processes during implementation of actions in a Beyond Design Basis (BDB) event. The attached industry technical position provides the basis that supports the application of change control requirements during BDB events, as well as describing the required evaluations during design-basis conditions.

If you require additional information concerning this transmittal, please feel free to contact me at (202) 739-8058; nxp@nei.org.

Sincerely,

A handwritten signature in black ink, appearing to read "N. Pappas", is written over a light blue horizontal line.

Nicholas Pappas

Attachment

¹ 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.