

May 5, 2015

Ellen Ginsberg
Vice President, General Counsel and Secretary
Nuclear Energy Institute
1201 F. Street N.W. Suite 1100
Washington, DC 20004

Dear Ms. Ginsberg:

Thank you for your November 7, 2014 letter setting forth the concerns of the Nuclear Energy Institute (NEI) regarding the NRC staff's (staff's) position that NRC regulations require Integrated Safety Analyses (ISAs) and ISA summaries for fuel cycle facilities. These summaries are intended to address high and intermediate consequence exposure events for all credible exposure pathways, including dermal and ocular exposures to hazardous chemicals within the NRC's regulatory jurisdiction, such as hydrogen fluoride. The specific issues you raised addressed the application of the backfit rule to the staff's positions.

The staff has prepared a draft Interim Staff Guidance (ISG) on dermal and ocular exposures at fuel cycle facilities, which was published for public comment in the *Federal Register* (80 FR 11692; March 4, 2015). Thereafter, in a supplemental notice published in the *Federal Register* (80 FR 21274; April 17, 2015), the staff specifically identified NEI's backfitting issues. The supplemental notice references your November 7, 2014 letter and the earlier NRC and NEI documents that were the basis for your letter. The supplemental notice also extended the public comment period to July 1, 2015. The extension allows more time for members of the public to review the additional information on backfitting presented in the supplemental notice, before submitting any comments on the draft ISG. The staff will consider all comments on backfitting submitted by the public during the public comment period and prepare comment responses. The draft staff comment responses will be provided to the Commission before the ISG and the comment responses are finalized.

Thank you for your letter, which engendered a careful re-evaluation of the backfitting matters addressed in your letter. If you have any further questions, please contact me at 301-415-1743.

Sincerely,

/RA/

Margaret M. Doane
General Counsel

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Sincerely,

Margaret M. Doane
General Counsel

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DATE	5/4/2015	5/4/2015	5/ 5 /2015

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