DAVID YOUNG
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April 25, 2018

Ms. Louise Lund
Director, Division of Licensing Projects
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: NEI 12-06, *Diverse and Flexible Coping Strategies (FLEX) Implementation Guide*, Revision 5

Project Number: 689

Dear Ms. Lund:

The Nuclear Energy Institute[1] and the industry have developed NEI 12-06, *Diverse and Flexible Coping Strategies (FLEX) Implementation Guide*, Revision 5, to clarify the guidance associated with replacement of Phase 3 FLEX equipment if used to respond to a declared emergency. We request a review of the document by the NRC staff followed by a discussion of any comments in a public meeting. The document will be revised to address staff comments and then submitted for endorsement.

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[1] The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting its members, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, suppliers and nuclear materials licensees, nuclear medicine and radiopharmaceutical companies, companies using nuclear technologies in the agricultural, food, and industrial sectors, universities and research laboratories, law firms, labor unions, and international electric utilities.

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If you have questions or require additional information, please contact John Egdorf at (202) 739-8021 or jre@nei.org, or me.

Sincerely,

David L. Young

c: Ms. Anne Boland, OE, NRC
        Mr. Patrick Moulding, OGC/GCHEA/AGCMLE, NRC
        Mr. Juan Peralta, OE/EB, NRC
        Mr. Eric Bowman, NRR/DLP/PBMB, NRC
        Mr. Tony Brown, NRR/DLP/PBEB, NRC