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NUCLEAR ENERGY INSTITUTE

PDR:  
per Jean Rathje

62 FR 27629  
May 20, 1997

David J. Modeen  
DIRECTOR, ENGINEERING  
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(2)

May 28, 1997

Mr. Gary M. Holahan  
Director, Division of Systems Safety and Analysis  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUBJECT: Proposed Generic Communication: Control Rod Insertion Problems  
(62 Fed. Reg. 27629 – May 20, 1997) Notice of Opportunity for  
Public Comment**

Dear Mr. Holahan:

The subject generic communication, which affects fifty-seven nuclear units, requests a verification of control rod drop times every 2,500 MWD/MTU after reaching prescribed burnup limits. This would entail a one-to-two day shutdown approximately every two months for each unit. The increased number of controlled reactor shutdowns and startups necessary for control rod testing will have a significant operational impact. It would interrupt power generation, increase the potential for inadvertent plant transients, and place added stresses on fuel and mechanical equipment.

Given the magnitude of the impact that the proposed generic communication will have on plant operations and economics, **the Nuclear Energy Institute requests an extension of the comment period expiration date from June 19, 1997, to July 19, 1997.** This extension is necessary to fully assess the technical and regulatory aspects of the proposed bulletin supplement.

Please notify us of your decision.

If you have questions, please contact John Butler at (202) 739-8108.

Sincerely,

David J. Modeen

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MISC PDR



Mr. Gary M. Holahan

May 28, 1997

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