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Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Attention: Rulemakings and Adjudications Staff

Subject: Comments on NEI Petition for Large Break LOCA Redefinition Proposed Rulemaking
(PRM-50-75 dated April 8, 2002)

Nuclear Management Company (NMC), LLC appreciates the opportunity to comment on the subject petition for rulemaking. NMC views the proposal in the petition as an important element in creating a regulatory structure that reflects today's state of engineering knowledge and operating experience.

The double-ended break design basis required by the current regulations has far-reaching effects on plant design and operation. However, improvements in engineering knowledge and methods and over 2,500 reactor-years of operating experience have shown that a double-ended break of the largest reactor coolant system piping should no longer be a dominant Light Water Reactor safety criterion. Adoption by the NRC of the proposed petition would enable more regulatory and industry resources to be focused on areas that are of more benefit to the safe operation of the nation's nuclear power plants.

Also, as described in the petition, the existing regulations are inconsistent in their treatment of the dynamic effects and other design aspects of the postulated design basis pipe break. Adoption of the proposed petition would allow the NRC to make the regulations more consistent, which is expected to increase confidence in the regulatory process.

It is recognized that there are technical issues to be resolved related to the implementation of the revised rule. The nuclear industry has committed significant resources to working with the NRC in a good faith effort to address these issues. NMC believes the resolution of these implementation issues can, and should, occur in parallel with the rulemaking, and should not become a predecessor to the rule change.

NMC views the regulatory change proposed in the NEI petition as a cornerstone in the NRC's commitment to improving the regulatory structure. We recognize that there are challenges associated with changing a requirement that is as entrenched as this one, but it is clear the time for such change has come. NMC does not want to see this opportunity for improvement lost. Consequently, NMC asks that the NRC act favorably upon NEI's petition.

Sincerely,

Michael D. Wadley
Senior vice president of
Government Affairs and
Business Development

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