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October 28, 2014

Mr. Christopher G. Miller Director, Division of License Renewal Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, DC 20555-0001

Subject: Industry Recommendations for Updating GALL Revision 2 and LR-SRP Revision 2

Project Number: 689

Dear Mr. Miller:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)¹ welcomes the opportunity to respond to the U.S. Nuclear Regulatory Commission (NRC) request for recommendations for updating NUREG-1801 Revision 2, Generic Aging Lessons Learned (GALL) Report, and NUREG-1801 Revision 2, Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants, (LR-SRP) to support subsequent license renewal (SLR) activities. This request was outlined in a teleconference with the NRC on October 21, 2013.

The attached technical input form provides industry recommendations for updating the Selective Leaching Program and associated aging management review lines in GALL Revision 2 and LR-SRP Revision 2. This recommended update for the Selective Leaching Program was previously provided via email to your staff.

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.

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NEI appreciates the opportunity to provide comments updating GALL Revision 2 and LR-SRP Revision 2 and respectfully request that you incorporate industry comments as recommended in our previous inputs. If you have any questions or require additional information, please contact me.

Sincerely,

Jan Am

Jason Remer

Attachment

c: Mr. Steven D. Bloom, NRR/DLR/RSRG, NRC Mr. William F. Burton, NRR/DLR/RSRG, NRC Ms. Bennett M. Brady, NRR/DLR/RSRG, NRC