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October 30, 2014

Mr. Jack R. Davis
Director
Japan Lessons-Learned Division
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Submittal of Local Intense Precipitation Warning Time White Paper, Revision 0

Reference: NRC Letter to Licensees, dated March 12, 2012, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near Term Task Force Review of Insights from the Fukushima Dai-ichi Accident"

Project Number: 689

Dear Mr. Davis:

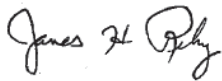
As part of their response to Reference 1, all licensees have to assess the potential for flooding caused by local intense precipitation (LIP). Traditionally, the LIP analysis evaluated a sudden, highly localized storm for which no warning time was assumed. NEI's Fukushima Flooding Task Force has prepared the attached white paper to establish a basis for allowing warning time for a LIP event under the conditions described in the paper. The content of this paper has been the subject of a number of meetings between the Staff and Industry. NEI believes that the version of this paper attached to this letter addresses all comments that have been received to date. The purpose of this letter is to submit revision 0 of the LIP Warning Time White Paper for NRC endorsement. The paper is not proprietary.

Consistent with other submittals supporting industry's response to reference 1, we believe NRC staff review of NEI 12-07 is exempt from the fee recovery provision contained in 10 CFR Part 170. This submittal supports a deliverable that is expected by the referenced letter; specifically Requested Information item 1.b) of Enclosure 2 of the reference requests an analysis of local intense precipitation. NRC reviews of such items are exempted under §170.11, Exemptions, Subpart (a) (1) (iii). This provision states, (a) "No application fees, license fees, renewal fees, inspection fees, or special project fees shall be required for:(1) A special project that is a request/report submitted to the NRC--(iii) As a means of exchanging information between industry organizations and the NRC for the specific purpose of supporting the NRC's generic regulatory improvements or efforts".

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If you have any questions about this information, please contact me at (202) 739-8137; jhr@nei.org.

Sincerely,

A handwritten signature in cursive script that reads "James H. Riley".

James H. Riley

Attachment

C: Mr. Jeremy Bowen, NRR/JLD/PPSD/JOMB, NRC
Mr. Michael X. Franovich, NRR/JLD/PPSD, NRC
Mr. Robert F. Kuntz, NRR/JLD/PPSD/JHMB, NRC
Ms. Sheena A. Whaley, NRR/JLD/PPSD/JHMB, NRC
Fukushima Flooding Task Force