



NUCLEAR ENERGY INSTITUTE

**Rod McCullum**  
DIRECTOR  
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September 10, 2010

Ms. Catherine Haney  
Director  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Integrated Safety Analysis: Why It Is Appropriate for Fuel Recycling Facilities

**Project Number: 689**

Dear Ms. Haney:

Enclosed for your review is a Nuclear Energy Institute white paper on the use of Integrated Safety Analysis (ISA) at U.S. Nuclear Regulatory Commission-licensed recycling facilities. This paper is intended as an information source for the NRC and should serve as a foundation for discussion with industry representatives on the issue.

This paper concludes that an ISA is a risk-informed, performance-based way of achieving and maintaining safety at fuel recycling facilities. As outlined in the paper, an ISA can be rigorously developed and used to support a safety decision for these facilities. Using qualitative or semi-quantitative techniques, as established for ISAs, these facilities can achieve and demonstrate safety in an effective and efficient manner.

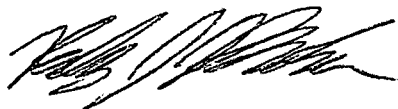
We believe that additional discussions between industry and the NRC can further advance the ongoing dialogue on the regulatory framework for recycling facilities that the NRC is in the process

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of developing. NEI is prepared to meet with the NRC staff, at its earliest convenience, for the purpose of discussing this white paper. If you have any questions, please address them to me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rod McCullum', with a stylized, cursive script.

Rod McCullum

Attachment

c: Ms. Marissa G. Bailey, Deputy Director NMSS/FSSS/SPTSD, NRC  
Mr. Thomas G. Hiltz, NMSS/FCSS/SPTSD, NRC  
NRC Document Control Desk