



NUCLEAR ENERGY INSTITUTE

# SAFEGUARDS INFORMATION

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Mr. Glenn Tracy  
Director, Division of Nuclear Security  
Office of Nuclear Security and Incident Response  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Mr. Tracy:

Enclosed for NRC review are changes the Industry suggests should be made to the draft ICMs for the dry fuel storage facilities. Attached is a line-in and line-out version of the ICMs detailing the changes. Also included is a second version of the ICMs that provides the bases for the changes being suggested by the Industry.

It is our position that the changes being suggested are an operationally sound risk and performance based alternative to the original draft version of the dry fuel storage ICMs.

Please contact me if you have any questions.

Sincerely,

Stephen D. Floyd

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NOTICE: THE ATTACHMENT TO THIS LETTER CONTAINS "SAFEGUARDS INFORMATION" AND MUST BE TREATED AS SUCH. UPON SEPARATION OF THE ATTACHMENT LETTER IS "DECONTROLLED."

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Rm.  
Etaine  
McNeil*

