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August 1, 2012

Mr. Michael E. Mayfield
Director, Advanced Reactor Program
Office of New Reactors
U.S. Nuclear Regulatory Commission
Mail Stop 6 E4
Washington, DC 20555-0001

Subject: Position Paper on Physical Security for Small Modular Reactors

Project Number: 689

Dear Mr. Mayfield:

Enclosed for NRC staff review and consideration is our position paper on physical security for small reactors (SMRs). This position paper supports NRC efforts described in SECY-11-0184, *Security Regulatory Framework for Certifying, Approving, and Licensing Small Modular Nuclear Reactors*.

In the SECY, the NRC staff informed the Commission of their assessment of adequacy of the current security regulatory framework for licensing of SMRs and noted that the existing regulations are sufficient to support near-term SMR design reviews. Likewise, the enclosed paper does not foresee a need for rulemaking; however, a vendor may seek exemption to certain regulations on a case-by-case basis focusing on performance-based outcomes.

The concepts of the enclosed paper were discussed with the NRC staff at public meetings on December 15, 2011 and April 5, 2012. At our next public meeting, we look forward to the staff's feedback on this position paper and further discussion on this topic.

Mr. Michael E. Mayfield

August 1, 2012

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If you have any questions, please contact me or TJ Kim (tjk@nei.org; 202-739-8128).

Sincerely,

A handwritten signature in black ink, appearing to read "RJB", is positioned above the printed name.

Russell J. Bell

Attachment

c: Ms. Stephanie M. Coffin, NRO/DARR, NRC
Ms. Amy E. Cabbage, NRO/DARR/APOB, NRC
Mr. Stewart L. Magruder, NRO/DARR/APRB, NRC
Mr. Wesley W. Held, NRO/DARR/APOB, NRC
Mr. Peter S. Lee, NSIR/DSP/RSLB, NRC
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