



May 7, 2015

USNRC Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Mark Tonacci, Chief
SMR Licensing Branch 1
Division of Advanced Reactors and Rulemaking
Office of New Reactors

Holtec International
SMR Inventec, LLC
Project Number – PRO0798

Subject: SMR Inventec, LLC Establishment of a Safeguards Information (SGI) Program and Request for SGI Use and Storage Approval

Dear Mr. Tonacci:

In June 2009, the Commission published a rulemaking in the Federal Register (FR) (74 FR 28112) requiring applicants and nuclear power plant designers, for a variety of licensing activities, to perform a design-specific assessment of the effects of the impact of a large, commercial aircraft. This assessment must also consider how to incorporate design features and functional capabilities into the nuclear power plant design to provide additional inherent protection with reduced use of operator actions. Additionally, on August 5, 2011, the NRC issued Regulatory Guide (RG) 1.217, "Guidance for the Assessment of Beyond-Design-Basis Aircraft Impacts," which endorses the methodologies described in the industry guidance document, Nuclear Energy Institute (NEI) 07-13, "Methodology for Performing Aircraft Impact Assessments for New Plant Designs," Revision 8, dated April 2011. Non-public versions of the RG and NEI 07-13 contain more specific details about the methodology used in performing aircraft impact assessments and are handled under Safeguards Information (SGI) controls. The non-public guidance documents contain SGI, and are only available to those individuals who have a need to know and who are qualified to access SGI. Plant designers (including their employees and agents) who meet the NRC's requirements for access to SGI will be entitled to use the more detailed guidance documents to perform the aircraft impact assessments.

SMR Inventec, LLC, as the developer of the SMR-160 Small Modular Reactor (SMR), is required to perform the aircraft impact assessment of the plant design to meet the above referenced rule. Access to SGI will be necessary to perform this assessment. In addition, other plant design activities, such as physical security protection systems design, will necessitate the use of SGI. Therefore, SMR Inventec, LLC has begun to assemble the necessary elements, processes and procedures in order to establish a Safeguards Information Program.

The purpose of this letter is to inform the NRC of SMR Inventec, LLC's need for SGI, and its intention to establish and implement a Safeguards Information Program which will comply with the requirements contained in 10 CFR 73.21. This SGI program will establish the requirements and responsibilities for the

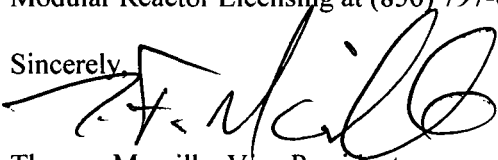
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protection, use, distribution, control and handling of Safeguards Information by qualified and approved SMR Inventec employees and agents.

SMR Inventec, LLC requests that the NRC provide guidance and direction regarding how to obtain NRC approval of the SMR Inventec, LLC Safeguards Information Program and receive required SGI in order to meet design objectives and maintain regulatory compliance.

Any questions or concerns regarding this request may be directed to Mark Beaumont, Director, Small Modular Reactor Licensing at (856) 797-0900 extension 3924.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Marcille', written over a horizontal line.

Thomas Marcille, Vice President
and Chief Nuclear Officer
SMR Inventec, LLC

cc: Jamie Mallon, PSEG
Mark Beaumont
Robert L. Norman, US NRC