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April 13, 2016

Dr. Jennifer L. Uhle
Director
Office of New Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: NEI Activities in Support of Advanced Non-Light Water Reactors

Project Number: 689

Dear Dr. Uhle:

The Nuclear Energy Institute (NEI)¹ supports an all-of-the-above nuclear future that includes large light water reactors (LWR), small modular reactors and advanced non-light water reactors. As progress on large and small light-water reactor commercialization continues, policymakers and industry leaders have become increasingly interested in advanced non-light water reactors due to their potential as a strategic clean energy technology to supplement existing light water reactor technologies and their potential to supply other sources of diverse energy products based on their operating characteristics. NEI is working with interested stakeholders and coordinating industry efforts to develop and commercialize advanced reactors.

The Advanced Reactor Working Group (ARWG) was formed last year to focus the industry's advanced reactor activities. To address the licensing challenges faced by non-LWRs, we recently formed the Advanced Reactor Regulatory Task Force (ARRTF) with a charge to work with the NRC staff to establish an efficient and predictable regulatory framework for advanced reactors. The work of the ARRTF will fall into four major areas of focus:

- resolution of regulatory policy issues for non-LWR advanced reactors stemming from incompatibility with LWR-centric regulations and guidance

¹ The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

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- establishing a staged regulatory approach conducive to advanced reactor development
- establishing a technology-inclusive regulatory structure for advanced reactors that is risk-informed and performance-based
- clarifying and readying the licensing process for potential non-commercial advanced reactor demonstration projects.

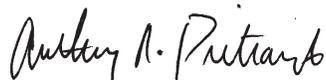
The ARWG will guide and assist the work of the ARRTF in these areas and will work to ensure coordination with separate task forces focused on advanced reactor technology and energy policy issues.

We were pleased to see the recent publication of the Nuclear Innovation Alliance (NIA) report titled "Strategies for Advanced Reactor Licensing." The NIA report provides a solid foundation of ideas from which the industry and NRC can begin development of an advanced reactor regulatory framework. The regulatory recommendations in the report are fully consistent with the four focus areas identified above, and we are coordinating with NIA, the U.S. Nuclear Infrastructure Council and other advanced reactor stakeholders on implementation of actions in each area. We are in the process of defining and prioritizing advanced reactor licensing and regulatory issues, and we look forward to engaging with the NRC staff soon on actions to address those issues. We appreciate that the NRC has already begun to address advanced reactor issues, including consideration of a staged regulatory approach, and that the NRC has requested separate funding to ramp up its advanced reactor activities as part of the administration's FY 2017 budget request.

The ARWG is the third NEI working group focused on new plants, joining the New Plants Working Group formed in 2001 and Small Modular Reactor Working Group formed in 2010. NEI has also formed the New Plants Advisory Committee (replacing the New Plants Oversight Committee), a senior executive level committee that will ensure an integrated, coordinated industry strategy on new nuclear plant development and deployment, including large LWRs, small modular reactors and non-LWR designs.

If you have any questions concerning the industry's advanced reactor activities, please contact me or Russ Bell (202.739.8087; rjb@nei.org).

Sincerely,



Anthony R. Pietrangelo

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