

**DAVID R. KLINE**  
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September 20, 2016

Ms. Maureen E. Wylie  
Chief Financial Officer  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Fee Exemption Request for NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, [and Independent Spent Fuel Storage Installation Security Plan]*, Section 21, Compensatory Measures

**Project Number: 689**

Dear Ms. Wylie:

On May 24, 2016, the Nuclear Energy Institute (NEI)<sup>1</sup> submitted Section 21 (Compensatory Measures) of NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, [and Independent Spent Fuel Storage Installation Security Plan]* for NRC fatal flaw review and endorsement. NEI 03-12 is the existing guidance that established a generic Security Plan template for the industry to meet requirements of 10 CFR 73.55. NEI would like to revise Section 21 of this document for efficiencies and clarity.

NEI requests that the NRC's review of NEI 03-12, and any future submissions of the guidance document be granted a fee waiver pursuant to the provisions of 10 CFR 170.11. This document meets the exemption requirement in 10 CFR 170.11(a)(1)(ii) in that it will "...assist the NRC in generic regulatory improvements or efforts (e.g., rules, regulatory guides, regulations, policy statements, generic letters, or bulletins)." In this case, the revision of this guidance supports increased regulatory efficiency of agency efforts as it provides a consistent industry approach for the treatment of compensatory measures. The NRC is the primary

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<sup>1</sup> 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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beneficiary of this guidance as the NRC has and will continue to use this document to support review of Security Plan revisions and the inspection efforts associated with 10 CFR 73.55.

Please contact me should you have any questions at (202) 739-8174; [dk@nei.org](mailto:dk@nei.org).

Sincerely,

A handwritten signature in black ink that reads "David R. Kline". The signature is written in a cursive style with some loops and a horizontal line under the "Kline" part.

David R. Kline

c: Ms. Melanie A. Galloway, NSIR/DSP, NRC  
NRC Document Control Desk