

**DAVID R. KLINE**  
*Director, Security*

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September 16, 2016

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

**Subject:** Fee Exemption Request for NEI White Paper, *Security Coping Time*, December 2015

**Project Number: 689**

Dear Ms. Wylie:

On December 17, 2015, the Nuclear Energy Institute (NEI)<sup>1</sup> submitted a white paper titled *Security Coping Time* for NRC review and endorsement. The *Security Coping Time* White Paper provides the industry with guidance and clarity for development of target sets. Licensees are required to develop target sets in accordance with 10 CFR 73.55(f)(1).

NEI requests that the NRC's review of the white paper and any future submissions of this 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)(iii) in that it is "a means of exchanging information between industry organizations and the NRC...for the specific purpose of supporting ongoing NRC generic regulatory improvements or efforts." In this case, the revision of this guidance supports increased regulatory efficiency of agency efforts as it provides a consistent industry approach for the development of coping time and target sets. The NRC is the primary beneficiary of this guidance as the NRC has and will continue to use this document to support review of target set revisions and the inspection efforts associated with 10 CFR 73.55.

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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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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 a large, stylized "D" and "K".

David R. Kline

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