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December 21, 2016

Mr. Brian J. Benney
Project Manager, Division of Reactor Safety Systems
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Submittal of Comments on Draft Safety Evaluation Report for NEI 16-03, *Guidance for Monitoring of Fixed Neutron Absorbers in Spent Fuel Pools*, Revision 0

Project Number: 689

Dear Mr. Benney:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)¹ submits the attached mark-up of the draft Safety Evaluation (SE) for NEI 16-03, *Guidance for Monitoring of Fixed Neutron Absorbers in Spent Fuel Pools*, Revision 0, dated August 2016 [Reference 1].

At the request of the U.S. Nuclear Regulatory Commission (NRC) staff [Reference 2], NEI 16-03 was submitted to the NRC for endorsement in May 2016 [Reference 3]. NEI 16-03 was subsequently updated and resubmitted as Revision 0 [Reference 4] to address the NRC Discussion Points [Reference 5] and the constructive discussion during the meeting between NRC and NEI on August 10, 2016 [Reference 6].

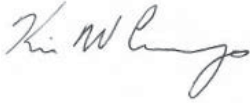
Once the NRC finalizes the Safety Evaluation, NEI will submit the approved, "-A" version of the report in accordance with LIC-500 [Reference 7].

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

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If you have any questions or require additional information, please contact me.

Sincerely,



Kristopher W. Cummings

References:

- [1] Draft Safety Evaluation for Nuclear Energy Institute Topical Report 16-03, *Guidance for Monitoring of Fixed Neutron Absorbers in Spent Fuel Pools* (ML16280A369), November 2016.
- [2] Summary of October 21, 2015, Public Meeting with Nuclear Energy Institute on NEI 12-16, Revision 1, *Guidance for Performing Criticality Analysis of Fuel Storage at Light-Water Reactor Power Plants*, (ML15294A491).
- [3] Submittal of NEI 16-03, *Guidance for Monitoring of Fixed Neutron Absorbers in Spent Fuel Pools*, Draft A, dated May 2016 (ML16147A078).
- [4] Submittal of NEI 16-03, *Guidance for Monitoring of Fixed Neutron Absorbers in Spent Fuel Pools*, Revision 0, Dated August 2016 (ML16265A248).
- [5] NEI 16-03 Discussion Points (ML16209A382).
- [6] Meeting Notice, 08/10/2016 NEI 16-03 Discussion (ML16221A182).
- [7] LIC-500, Revision 5, *Topical Report Process* (ML13158A296).

Attachment

c: Mr. William M. Dean, NRR, NRC
Mr. Robert M. Taylor, NRR/DSS, NRC
Ms. Mary Jane Ross-Lee, NRR/DE, NRC
Mr. Eric Oesterle, NRR/DSS/SRXB, NRC
Mr. Juan D. Peralta, NRR/DIRS/IRIB, NRC
Mr. Matthew G. Yoder, NRR/DE/ESGB, NRC
Mr. Alex Chereskin, NRR/DE/ESGB, NRC