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January 9, 2017

Mr. Brian J. Benney
Senior Project Manager
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Submittal of NEI 12-16, *Guidance for Performing Criticality Analyses of Fuel Storage at Light Water Reactor Power Plants*, Revision 2 – DRAFT B

Project Number: 689

Dear Mr. Benney:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)¹ is providing an updated version of NEI 12-16, *Guidance for Performing Criticality Analyses of Fuel Storage at Light Water Reactor Power Plants* (Revision 2 – Draft B). This revision addresses the Open Items identified from the audit of NEI 12-16, Revision 2 – Draft A, conducted from October 24-28, 2016.

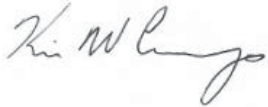
NEI 12-16, Revision 2 – Draft A was submitted to the NRC on May 31, 2016, [Ref. 1] to address the NRC's Request for Additional Information [Ref. 2].

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.

Mr. Brian J. Benney
January 9, 2017
Page 2

We look forward to continuing to work with the NRC staff to finalize this important guidance document in the first quarter of 2017. Please do not hesitate to contact me at any time with questions.

Sincerely,



Kristopher W. Cummings

References:

- [1] Final Response to Request for Additional Information Related to NEI 12-16, Guidance for Performing Criticality Analyses of Fuel Storage at Light Water Reactor Power Plants, and EPRI Report 3002003073, "Sensitivity Analysis for Spent Fuel Pool Criticality" and NEI 12-16, Revision 2 – DRAFT A (ML16155A120)
- [2] REQUEST FOR ADDITIONAL INFORMATION RELATED TO NEI 12-16, "GUIDANCE FOR PERFORMING CRITICALITY ANALYSES OF FUEL STORAGE AT LIGHT-WATER REACTOR POWER PLANTS" (ML15273A056)

Attachment

c: Mr. William M. Dean, NRR, NRC
Mr. Brian McDermott, NRR, NRC
Mr. Timothy J. McGinty, NRR/DSS, NRC
Mr. Robert M. Taylor, NRR/DSS, NRC
Mr. Eric Oesterle, NRR/DSS/SRXB, NRC
Mr. Robert Lukes, NRR/DSS/SNPB, NRC
Mr. Kent Wood, NRR/DSS/SNPB/SFT, NRC
Mr. Amrit Patel, NRR/DSS/SNPB/SFT, NRC