

**KRISTOPHER W. CUMMINGS**

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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)<sup>1</sup> 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].

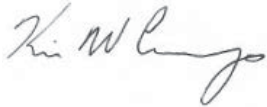
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<sup>1</sup> The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. 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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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