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April 6, 2017

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:

The Nuclear Energy Institute (NEI)¹ will be submitting an updated 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 review and endorsement. NEI 03-12 is the existing, NRC staff-endorsed guidance that establishes a generic Security Plan template for the industry to meet the requirements of 10 CFR 73.55. NEI would like to revise Section 21 to allow for licensee implementation of changes that will improve the effectiveness and efficiency of compensatory measures.

NEI requests that the NRC's review of the revised Section 21, including any subsequent submittals necessary to address staff review comments, 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 treatment of compensatory measures. The NRC is the primary 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.

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.

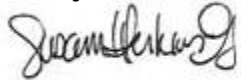
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Questions concerning this request should be directed to Mr. David Young (202-739-8127 or dly@nei.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Perkins-Grew". The signature is written in a cursive style with a large, stylized initial "S".

Susan Perkins-Grew

c: Mr. James Andersen, NSIR/DPCP, NRC
Ms. Alison Rivera, NSIR/DPCP/RSB, NRC
NRC Document Control Desk