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April 25, 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)<sup>1</sup> 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 is revising Section 21 to allow for licensee implementation of changes that will improve the effectiveness and efficiency of compensatory measures. Where necessary, conforming changes of an editorial nature were also made to the remainder of NEI 03-12 (e.g., changes to page numbering).

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. The document meets the exemption requirement in 10 CFR 170.11(a)(1)(ii) in that it will "...assist the NRC in generic regulatory improvements or efforts." In this case, NRC review and endorsement of the revision of Section 21 will facilitate a consistent industry approach to the assessment and implementation of compensatory measures, and thereby increase the efficiency of related regulatory activities such as the review of Security Plan revisions and inspections 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.

Ms. Maureen E. Wylie

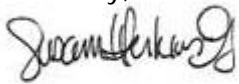
April 25, 2017

Page 2

This letter replaces our previous fee exemption request letter dated April 6, 2017.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Perkins-Grew". The signature is fluid and cursive, with the first name "Susan" being the most prominent.

Susan Perkins-Grew

c: Mr. James Andersen, NSIR/DPCP, NRC  
Ms. Alison Rivera, NSIR/DPCP/RSB, NRC  
Mr. William Blaney, CFO/DC/ARB/FBT, NRC  
NRC Document Control Desk