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May 1, 2017

Ms. Maureen E. Wylie
Chief Financial Officer
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Fee Exemption Request for Security Event Mitigation Assessment White Paper

Project Number: 689

Dear Ms. Wylie:

The Nuclear Energy Institute (NEI)¹ will soon be submitting a white paper entitled, *Security Event Mitigation Assessment*, for NRC review and endorsement. This white paper provides a methodology for determining if credit may be given for the implementation of an operator action, or a mitigation action or strategy, in response to a physical attack on a nuclear power facility in order to prevent radiological sabotage. The methodology also evaluates potential credit for a tactical response needed to eliminate adversary interference so as to allow completion of a mitigation action or strategy (e.g., by a local law enforcement agency).

NEI requests that the NRC's review of the white paper, 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, the NRC's review and endorsement of the white paper will facilitate a consistent industry approach to the assessment of potential operation actions, and mitigation actions and strategies, thereby increasing the efficiency of inspection activities associated with the requirements of 10 CFR 73.55. In addition, the staff may use information in the paper to address aspects of the Commission direction provided in memorandum, *Staff Requirements – SECY-16-0073 – Options and Recommendations for the Force-on-Force Inspection Program in Response to SRM-SECY-14-0088*.

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.

Ms. Maureen E. Wylie

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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