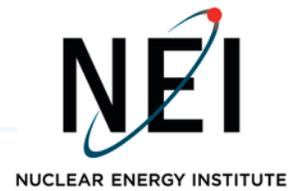


**MICHAEL D. TSCHILTZ**  
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April 24, 2017

Mr. Michael E. Mayfield  
Acting Deputy Director  
Office of New Reactors  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Request for Review and Comment on *Clarifying "Major Portions" of a Reactor Design in Support of a Standard Design Approval Report*

**Project Number: 689**

Dear Mr. Mayfield:

This letter provides a link to the Nuclear Innovation Alliance (NIA) report *Clarifying "Major Portions" of a Reactor Design in Support of a Standard Design Approval* for U.S. Nuclear Regulatory Commission (NRC) review and comment. The draft NRC Non-Light Water Reactor (Non-LWR) Vision and Strategy – Staff Report: Near-Term Implementation Action Plans, Volume 2, includes Strategy 3: Develop guidance for a flexible non-LWR regulatory review process within the bounds of existing regulations, including the use of conceptual design reviews and staged-review processes. One of the existing regulations that could be utilized in a staged-review process is 10 CFR Part 52, Subpart E – Standard Design Approvals. However, this option has not been exercised with respect to the ability to seek review of a major portion of a standard design.

NIA, with the support of the Nuclear Energy Institute (NEI)<sup>1</sup> on behalf of the nuclear energy industry, has developed proposed guidance for clarifying "major portions." We appreciate the NRC's recognition in the near-term implementation action plan for Strategy 3, specifically Contributing Activity 3.4, that a standard design approval is among the various regulatory applications available and that more guidance could be provided to clarify expectations for such submittals. Through recent NRC/industry interactions it has been determined that guidance for clarifying "major portions" as identified in 10 CFR 52.131 would be useful to increase the predictability of the standard design approval process for potential applicants and NRC reviewers.

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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.

Mr. Michael E. Mayfield

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This report provides example criteria and related considerations for an applicant to use in establishing the scope of "major portions" for their specific application. The report also provides insight on how a standard design approval might be useful in a staged-review process. Based on interactions with the NRC, the industry will determine the best approach to obtain NRC endorsement of its use.

Please utilize the following link to retrieve the [report](#). If you have any questions, please contact me or Kati Austgen (202.739.8068; [kra@nei.org](mailto:kra@nei.org)).

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Tschiltz". The signature is written in a cursive style with a large, sweeping "M" and "T".

Michael D. Tschiltz

c: Ms. Vonna L. Ordaz, NRO, NRC  
Mr. John D. Monninger, NRO/DSRA, NRC  
Ms. Amy E. Cabbage, NRO/DEIA/ARPB, NRC  
Mr. William D. Reckley, NRO/DEIA/ARPB, NRC  
NRC Document Control Desk