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June 29, 2017

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

Subject: Fee Exemption Request for Activities Performed for NRC Review and Endorsement of NEI 17-04, *Model SLR New and Significant Assessment Approach for SAMA, Revision 0*

Project Number: 689

Dear Ms. Wylie:

In a letter dated June 29, 2017, NEI has asked for the U.S. Nuclear Regulatory Commission (NRC) staff's endorsement of NEI 17-04 "Model SLR New and Significant Assessment Approach for SAMA." NEI 17-04 is a model approach for assessing the significance of new information of which the applicant for renewal of a nuclear power reactor operating license or extension of a combined license is aware that relates to either (1) the severe accident mitigation design alternatives (SAMDA) analysis or severe accident mitigation alternatives (SAMA) analysis documented in the NRC's final environmental statement (FES, FSEIS, or EA) that supported issuance pursuant to 10 CFR Part 50 (or Part 54) of the reactor's initial (or renewed) operating license or (2) the SAMDA analysis documented in the NRC's final environmental statement (FES, FSEIS, or EA) that supported issuance pursuant to 10 CFR Part 52 of the reactor's combined license and the design certification incorporated therein by reference, if any. Subsequent license renewal (SLR) applicants are required to perform the assessment for which this document provides guidance and include results in the applicant's environmental report.

The purpose of this letter is to request that the NRC's review and use of NEI 17-04, and any future submissions of this guidance document, be granted a fee waiver pursuant to the provisions of 10 CFR 170.11. In addition, NEI requests that any present or future NRC activities performed using the processes outlined in NEI 17-04 also be covered under the fee waiver. This 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 (e.g., rules, regulatory guides, regulations, policy statements, generic letters, or bulletins)." The NRC is the primary beneficiary of this guidance as the NRC will use this document to support evaluation of

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environmental reports in SLR application submittals. In this case, the use of the guidance supports increased regulatory efficiency of agency efforts as it provides a consistent approach for implementing the requirements of 10 CFR Part 51, as it applies to license renewal. Once endorsed by NRC, the use of this guidance supports increased regulatory efficiency of agency efforts as the methods evaluated under this process will be used by many licensees in completing and submitting SLR applications, which will increase NRC efficiency in completing an application review and reduce burden substantially.

If you have any questions or require additional information, please contact me.

Sincerely,



Nancy L. Ranek

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