



August 3, 2017
E-49216

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

Subject: Fee Exemption Request for Application for Amendment 16 to Standardized NUHOMS® Certificate of Compliance No. 1004 for Spent Fuel Storage Casks, Revision 0 (Docket No. 72-1004)

- Reference:**
1. Letter from Jayant Bondre (TN Americas LLC) to Document Control Desk (NRC), "Application for Amendment 16 to Standardized NUHOMS® Certificate of Compliance No. 1004 for Spent Fuel Storage Casks, Revision 0 (Docket No. 72-1004)" dated June 29, 2017 (ML17191A235)
 2. Letter from Rodney McCullum, Nuclear Energy Institute (NEI) to Michael Layton (NRC), "Regulatory Issue Resolution Protocol Screening Form and Resolution Plan for Improving the Part 72 Regulatory Framework (RIRP-I-16-01)," Project Number 689," dated May 12, 2017 (ML17138A119)
 3. Letter from John Vera (NRC) to Jayant Bondre (TN Americas LLC), "Application for Amendment 16 to Standardized NUHOMS® Certificate of Compliance No. 1004 – Accepted for Review," dated July 21, 2017 (see Enclosure 1)

In Reference 1 submitted on June 29, 2017, TN Americas LLC (TN) submitted an application to amend its Certificate of Compliance (CoC) No. 1004 for the Standardized NUHOMS® System. This amendment application is a pilot licensing action intended to implement the format, content and selection criteria described in the Reference 2 enclosure titled "ISFSI LICENSE AND CASK CoC FORMAT, CONTENT, AND SELECTION CRITERIA." Reference 2 also includes the Nuclear Energy Institute (NEI)'s updated version of the draft Regulatory Issue Resolution Protocol (RIRP) Resolution Plan for Improving the Efficiency of the Regulatory Framework for Dry Storage of Spent Nuclear Fuel (RIRP-I-16-01). The pilot application for CoC 1004 Amendment 16 is the next step in that plan. Per Reference 3, the application for CoC 1004 Amendment 16 has been accepted for review by the NRC.

As discussed during the pre-application meeting on June 15th (ML17151A233), based on the substantial cost savings and other benefits this licensing action will provide to the NRC and to the nuclear industry, we request that NRC review and approval fees be waived for Amendment 16. We believe that an exemption from fees is warranted per the requirements of 10 CFR 170.11(a)(1)(ii) since this action relates to assisting the NRC in generic regulatory improvements or efforts. The result of the RIRP-I-16-01 discussed in Reference 2 and the pilot licensing action discussed in Reference 1 is a significantly more efficient used fuel dry storage regulatory framework.

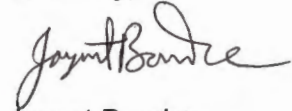
We also believe that an exemption from fees is warranted per the requirements of 10 CFR 170.11(a)(12) since TN volunteered to have the evaluation of this proposed amendment at the NRC's request.

TN AMERICAS LLC

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Should you have any questions regarding this matter, or require additional information, please contact Mr. Dennis Williford at 704-805-2223 or contact me at 410-910-6881.

Sincerely,



Jayant Bondre
Chief Technical Officer

cc: Michael Layton (NRC SFM)
John McKirgan (NRC SFM)
Christian Jacobs (NRC SFM)
John Vera (NRC SFM)
Rodney McCullum (NEI)

Enclosures:

1. Letter from John Vera (NRC) to Jayant Bondre (TN Americas LLC), "Application for Amendment 16 to Standardized NUHOMS® Certificate of Compliance No. 1004 – Accepted for Review," dated July 21, 2017

E-49216

Enclosure 1

**Letter from John Vera (NRC) to Jayant Bondre (TN Americas LLC),
“Application for Amendment 16 to Standardized NUHOMS® Certificate
of Compliance No. 1004 – Accepted for Review,” dated July 21, 2017**



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 21, 2017

Mr. Jayant Bondre
Chief Technical Officer
TN Americas LLC
7135 Minstrel Way, Ste. 300
Columbia, MD 21045

SUBJECT: APPLICATION FOR AMENDMENT NO. 16 TO STANDARDIZED NUHOMS®
CERTIFICATE OF COMPLIANCE NO. 1004 – ACCEPTED FOR REVIEW

Dear Mr. Bondre:

By letter dated June 29, 2017, you submitted an application for Amendment No. 16 to Certificate of Compliance No. 1004, for the Standardized NUHOMS® System. The application is a pilot intended to implement the format, content, and selection criteria for certificates of compliance developed with the Nuclear Energy Institute through Regulatory Issue Resolution Protocol RIRP-1-16-01, "Efficiency of the Regulatory Framework for Dry Storage of Spent Nuclear Fuel." This letter acknowledges receipt of your application and informs you that the application appears to contain the necessary information to begin our review.

Regarding your request for a fee waiver, per the regulations at Title 10 of the *Code of Federal Regulations* (CFR), Section 170.11, the request should be made in writing directly to the NRC's Chief Financial Officer, in accordance with 10 CFR 170.5.

We have established a schedule for the review. The schedule allows for the staff to issue a request for additional information by October 18, 2017, and, if a second request for additional information is not needed, a certificate of compliance to be issued by August 2018, based on you responding to the request for additional information by the end of November 2017. Due to the pilot nature of this application, we are not able to provide an hour estimate for the review. We intend to hold monthly public meetings with TN Americas, LLC to discuss the progress of and technical matters pertaining to the review, starting in August 2017.

If you have any questions regarding this matter, please contact me at (301) 415-5790.

Sincerely,

A handwritten signature in black ink, appearing to read "John Vera", written over a horizontal line.

John Vera, Project Manager
Spent Fuel Licensing Branch
Division of Spent Fuel Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 72-1004
CAC No. L25231