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September 13, 2017

Ms. Maureen Wylie
Chief Financial Officer
U.S. Nuclear Regulatory Commission
Washington, D.C. 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)

Project Number: 689

Dear Ms. Wylie:

On behalf of TN Americas LLC, the Nuclear Energy Institute (NEI)¹ is requesting an exemption from NRC fees for Application for Amendment 16 to Standardized NUHOMS® Certificate of Compliance No. 1004 for Spent Fuel Storage Casks, Revision 0 (Docket No. 72-1004) [Ref. 1]. NEI strongly agrees with TN Americas LLC that there will be substantial cost savings and other benefits to the NRC and the nuclear industry as a result of this licensing action. Therefore, we endorse the TN request that NRC review and approval fees be waived for Amendment 16.

As indicated in Reference 1, TN Americas LLC (TN), submitted on June 29, 2017, an application to amend its Certificate of Compliance (CoC) No. 1004 for the Standardized NUHOMS® System. This request meets the requirements of 10 CFR 170.11(a)(1)(ii), which permits an exemption from fees since this action relates to assisting the NRC in generic regulatory improvements or efforts. We believe that this work will establish a significantly more efficient used fuel dry storage regulatory framework. In this case, the generic regulatory improvements stem from this application's role as a pilot licensing action is intended to implement the format, content and selection described in Reference 2. Also included in Reference 2 is 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 central element of that plan. As noted in Reference 3, the application for CoC 1004 Amendment 16 has been accepted for review by the NRC.

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 Wylie
September 13, 2017
Page 2

I look forward to continuing to work with NRC and TN Americas LLC to implement this important improvement to the dry storage regulatory framework. If you have any questions, please contact me at 202.739.8106; mar@nei.org.

Sincerely,



Mark A. Richter

References

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

c: Michael Layton, NRC SFM
John McKirgan, NRC SFM
Christian Jacobs, NRC SFM
John Vera, NRC SFM
Rodney McCullum, NEI
Jayant Bondre, TN