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January 2, 2018

Dr. Andrew Bates
Chairman, Licensing Support Network Advisory Review Panel
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Project Number: 689

Subject: Response of the Nuclear Energy Institute to the December 18, 2017, Information Request to NRC Licensing Support Network Advisory Review Panel (LSNARP) member organizations and the NRC Notice of LSNARP Meeting, 82 Fed. Reg. 60634 (Dec. 21, 2017)

Dear Dr. Bates:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)¹ appreciates the opportunity to participate in the NRC Licensing Support Network Advisory Review Panel (LSNARP). This letter responds to your December 18, 2017, electronic mail to Mr. Rod McCullum and Ms. Ellen Ginsberg of NEI. That email requests information about NEI's plans to participate in LSNARP meetings currently scheduled for January 30-31, 2018. These meetings are further discussed in a related LSNARP notice published at 82 Fed. Reg. 60634 (Dec, 21, 2017). Also relevant to this discussion is an NRC document entitled "Reconstitution/Replacement Options for the Licensing Support Network," Dec. 18, 2017 (attached to your Dec. 18 email), which has been superseded by Revision 1 to that document, dated December 21, 2017.

We understand that the primary focus of the Jan. 30-31, 2018 meetings is for the NRC to "initiate information-gathering activities regarding reinstating or replacing the Licensing Support Network (LSN)." Because the LSN was decommissioned when the Yucca Mountain adjudicatory proceeding was

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.

suspended in 2011, the LSNARP now seeks additional information to assist the Commission in making efficient, informed decisions about appropriate means for reconstituting the LSN's functionality, if the Yucca Mountain adjudication were to re-commence in the future. The LSNARP proposes to use the LSN Reconstitution/Replacement Options paper to support the discussion.

The functionality of the LSN is very important to the restart of the Yucca Mountain licensing proceeding. We commend the LSNARP for taking proactive steps to address challenges to the restoration of the LSN, particularly given the considerable evolution in information technology capabilities since the proceeding was suspended.

Although NEI is available to support the meetings as scheduled, we note that on December 22, 2018, you received a request from another LSNARP member, Mr. Robert Halstead, Executive Director, Nevada Office of the Governor, Agency for Nuclear Projects, that the meetings be postponed so that LSNARP members could have more time to evaluate the proposed options for LSN replacement/reconstitution.

Recognizing the considerable effort of the LSNARP to develop the four proposed options in Revision 1 of "Reconstitution/Replacement Options for the Licensing Support Network," it would be beneficial to allow additional time for LSNARP members to assess the proposed options and possibly develop alternatives. NEI therefore supports a very limited deferral (30 to 45 days) of the meetings.

As just noted, NEI strongly recommends deferral, but if the meetings are held as now scheduled, we anticipate that Anne W. Cottingham (Associate General Counsel, NEI), Kaitlin E. Rekola (Staff Counsel, NEI), and John D. McIntire (Executive Director and Chief Information Officer, NEI) will attend the sessions in person. Ellen C. Ginsberg (Vice President and General Counsel, NEI) also may attend the meetings. As the primary NEI representative to the LSNARP, I will try to participate remotely.

NEI looks forward to engaging with NRC on LSN matters as the Yucca Mountain licensing proceeding moves forward. We believe it is important that NRC be in a position to move forward expeditiously once the proceeding is funded, and having a fully functional LSN is a necessary tool for this to happen.

If you have any questions or require additional information, please do not hesitate to contact me (rxm@nei.org) or Ellen Ginsberg (ecg@nei.org).

Sincerely,



Rod McCullum