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March 23, 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: Comments on February 27-28, 2018 LSNARP Meeting

Dear Dr. Bates:

The Nuclear Energy Institute (NEI)¹ appreciates the opportunity to participate in the February 27-28 meetings of the NRC Licensing Support Network Advisory Review Panel (LSNARP). We believe that these meetings provided for a thorough exploration of potential options for reconstituting or replacing the Licensing Support Network ("LSN"). See 83 Fed. Reg. 1274.

As explained in the meeting notice, the LSN was an internet-based electronic discovery database developed to aid the NRC in complying with the schedule for the agency's decision on the construction authorization for the high-level waste repository. That schedule was prescribed in Section 114(d) of the Nuclear Waste Policy Act of 1982, as amended. See 83 Fed. Reg. 1274, 1276.

The functionality of the Licensing Support Network is very important to the restart of the NRC Yucca Mountain licensing proceeding. NEI commends the LSNARP for taking proactive steps to address challenges to the restoration of the LSN, particularly given the evolution in information technology capabilities since the Yucca Mountain licensing proceeding was suspended.

Based on the discussion held at the February 27-28 meeting, NEI continues to support Alternative One under Option 2 – *Use of existing Public ADAMS LSN Library with EIE modification*. That approach is described in the NRC's "Reconstitution/Replacement Options for the Licensing Support Network"; see Section 7.3.1, pp. 10-13. We believe Option 2, Alternative One offers access to both existing and new

¹ The Nuclear Energy Institute (NEI) is responsible for establishing unified nuclear industry policy on behalf of its members on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include 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.

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documentary material to both adjudication participants and the public at the lowest cost, shortest implementation timeframe, and lowest risk score. NEI continues to take no position on Option 2, Alternative 2, but would be willing to discuss it as a potential second choice if NRC determines that Alternative 1 cannot be implemented.

NEI encourages the NRC to proceed with the implementation of Alternative One Option 2 in the most expeditious manner possible, within the constraints of available funding. We do not believe that additional deliberations with the LSNARP are necessary to support this course of action.

NEI looks forward to continuing to engage with the NRC on Licensing Support Network matters as the Yucca Mountain licensing proceeding moves forward. If you have any questions or require additional information, please do not hesitate to contact me (rxm@nei.org) or NEI General Counsel Ellen Ginsberg (ecg@nei.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Rod McCullum", written in a cursive style.

Rod McCullum

SECY, LSNARP

From: McCULLUM, Rodney <rxm@nei.org>
Sent: Friday, March 23, 2018 3:10 PM
To: Bates, Andrew; SECY, LSNARP
Subject: [External_Sender] Comments on February 27-28, 2018 LSNARP Meeting
Attachments: 03-23-18_NRC_NEI Comments 02 2018 LSNARP Meeting.pdf

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