

April 20, 2018

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

Subject: Fee Exemption Request in Accordance with 10 CFR 170.11 for EPRI Report No. 3002005564, "Development of Generic Scaling Factors for Technetium-99 and Iodine-129 in Low and Intermediate Level Waste"

Dear Ms. Wylie:

Please accept this submittal by the Electric Power and Research Institute (EPRI)¹ of the publicly available EPRI report, No. 3002005564 entitled, "Development of Generic Scaling Factors for Technetium-99 and Iodine-129 in Low and Intermediate Level Waste" for NRC review and endorsement. The document is available at www.epri.com and can be freely downloaded [here](#). The EPRI guidance is a risk-informed methodology that provides scaling factors for two specific radioisotopes that industry and the U.S. Nuclear Regulatory Commission staff have acknowledged lack a scientifically-credible method of measurement. The scaling factors were developed to provide a simple, efficient and cost-effective tool to address questions concerning potential non-conformances involving the measurement of radiation levels on shipments of radioactive waste as discussed in Regulatory Issue Summary (RIS) RIS-2015-02, "Reporting of H-3, C-14, Tc-99, and I-129 on the Uniform Waste Manifest". NRC staff acknowledged in a recent response letter to the Nuclear Energy Institute (NEI) from John Tappert, NMSS/DUWP that staff is familiar with the EPRI report and the report has the potential to provide a generic means for NRC licensees to demonstrating compliance with requirement to report difficult to measure radionuclides.

EPRI requests that the NRC staff review of EPRI Report No. 3002005564, "Development of Generic Scaling Factors for Technetium-99 and Iodine-129 in Low and Intermediate Level Waste" be granted a fee waiver or exemption pursuant to the provisions of 10 CFR 170.11. 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)." In this case, NRC review and endorsement of EPRI Report No. 3002005564 will facilitate a consistent approach in reporting difficult to detect radionuclides. Furthermore, wide-spread use of the EPRI report will save the NRC and industry resources by increasing the efficiency of licensee-specific review time and effort.

¹ The Electric Power Research Institute (EPRI) conducts research, development, and demonstration projects for the benefit of the public in the United States and internationally. As an independent, nonprofit organization for public interest energy and environmental research, we focus on electricity generation, delivery, and use in collaboration with the electricity sector, its stakeholders and others to enhance the quality of life by making electric power safe, reliable, affordable, and environmentally responsible. More information can be found at www.epri.com.

If you have any questions or require additional information, please contact me at (469) 586-7468.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lisa Edwards". The signature is fluid and cursive, with a long horizontal stroke at the end.

Lisa Edwards

c: John Tappert, NMSS/DUWP
Janet R. Schlueter, NEI