

CHRIS EARLS
Senior Director
Regulatory Affairs

1201 F Street, NW, Suite 1100
Washington, DC 20004
P: 202-739-8078
cee@nei.org
www.nei.org



November 12, 2019

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

Subject: Fee Exemption Request for Activities Performed for NRC Review and Endorsement of
NEI 17-04, *Model SLR New and Significant Assessment Approach for SAMA, Revision 1*

Project Number: 689

Dear Ms. Wylie:

In a letter dated August 4, 2017, the U.S. Nuclear Regulatory Commission (NRC) staff approved a fee waiver request for NRC activities performed for the review and endorsement of NEI 17-04 "Model SLR New and Significant Assessment Approach for SAMA, Revision 0." NEI 17-04 is a model approach for assessing the significance of new information that an applicant for renewal of a nuclear power reactor operating license or extension of a combined license is aware of and that may relate to either (1) the severe accident mitigation design alternatives (SAMDA) analysis or severe accident mitigation alternatives (SAMA) analysis documented in the NRC's final environmental statement (FES, FSEIS, or EA) that supported issuance pursuant to 10 CFR Part 50 (or Part 54) of the reactor's initial (or renewed) operating license or (2) the SAMDA analysis documented in the NRC's final environmental statement (FES, FSEIS, or EA) that supported issuance pursuant to 10 CFR Part 52 of the reactor's combined license and the design certification incorporated therein by reference, if any. Subsequent license renewal (SLR) applicants are required to perform this type of assessment and include the results in the applicant's environmental report.

In a letter dated November 12, 2019, NEI is now asking for the NRC staff's endorsement of NEI 17-04, Revision 1 dated August 2019. NEI 17-04, Revision 1 reflects changes to address challenges that applicants and the NRC staff identified during preparation and processing of the evaluations in three lead plant SLR applications for significance of new information related to SAMA analyses. These changes clarify the definition of SAMAs to be analyzed in the first stage of the model approach (Stage 1) and clarify the processes that may be used in Stage 1 to estimate risk reduction.

The purpose of this letter is to request that the NRC's review of this guidance document and any subsequent revision of it be granted a fee waiver pursuant to the provisions of 10 CFR 170.11. Like Revision 0, Revision 1 of this document meets the exemption requirement in 10 CFR 170.11(a)(1)(ii) in that it will "...

Ms. Wylie
November 12, 2019
Page 2

assist the NRC in generic regulatory improvements or efforts (e.g., rules, regulatory guides, regulations, policy statements, generic letters, or bulletins)." The NRC is the primary beneficiary of this guidance as the NRC will use this document to support evaluation of environmental reports in SLR application submittals. In this case, the use of the guidance supports increased regulatory efficiency of agency efforts as it provides a consistent approach for implementing the requirements of 10 CFR Part 51, as it applies to license renewal. Once endorsed by NRC, the use of this guidance supports increased regulatory efficiency of agency efforts as the methods evaluated under this process will be used by many licensees in completing and submitting SLR applications.

If you have any questions or require additional information, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Chris Earls". The signature is written in a cursive style with a long, sweeping underline.

Chris Earls

Cc: Robert Elliott, NMSS/REFS
Jeffrey J. Rikhoff, NMSS/REFS
Kevin Folk, NMSS/REFS
Jerry Dozier, NMSS/REFS
Document Control Desk, NRC