



July 09, 2021

Ms. Cherish K. Johnson  
Chief Financial Officer

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Docket No. 72-1014, Certificate of Compliance (CoC) No. 1014

Subject: Fee Exemption Request for Review and Endorsement of Holtec Topical Report on Methodology for Fuel Qualification

Dear Ms. Johnson:

On November 8, 2019 NEI submitted a letter (Agencywide Documents Access and Management System [ADAMS] Accession No. ML19318D970), and a white paper outlining proposed risk informed enhancements to the regulatory framework for spent nuclear fuel storage and transportation systems (ADAMS Accession No. ML19318D971). A series of Public Workshops on Spent Fuel Performance Margins then took place on January 22, 2020 (ADAMS Accession No. ML20028F277), March 25-26, 2020 (ADAMS Accession No. ML20106F135), April 15-16, 2020 (ADAMS Accession No. ML20126G388), June 11, 2020 (ADAMS Accession No. ML20170A355), June 23 (ADAMS Accession No. ML20197A299), and July 28, 2020 (ADAMS Accession No. ML20223A352), September 9, 2020 (ADAMS Accession No. ML20262H259), and November 6, 2020 (ADAMS Accession No. ML20329A468). Based on the discussion in the November 6 meeting, Holtec agreed to develop and submit a Topical Report on Methodology for Fuel Qualification.

On February 1, 2021, Holtec submitted a Draft of the Topical Report on the Methodology for Fuel Qualification for Dry Storage Systems (ADAMS Accession No. ML21032A347). This draft was submitted to form the basis for a presubmittal meeting (ADAMS Accession No. ML21077A267), to support a submittal of the final version of this report to the NRC for review and approval. This Topical Report is intended to provide documentation of a method of evaluation and/or framework that can be used by other Certificate Holders beyond Holtec if they should choose to do so. Therefore, the manpower and review cost savings this Topical Report provides (as discussed in the presubmittal meeting) will extend to the entire industry. It is anticipated that use of the framework outlined in the Topical Report will reduce requests for NRC review of 10 CFR Part 72



Certificate of Compliance amendments.

Based on the benefits this Topical Report will provide to the NRC and to the nuclear industry, we request that NRC review and approval fees be waived. We believe that an exemption from fees is warranted per the requirements of 10 CFR 170.11(a)(1)(ii) since this action relates to assisting the NRC in generic regulatory improvements or efforts. Specifically, our fee exemption request is based on the following regulations, 10 CFR 170.11(a)(1)(ii) and 10 CFR 170.11(a)(13).

“10 CFR 170.11(a) - No application fees, license fees, renewal fees, inspection fees, or special project fees shall be required for: (1) A special project that is a request/report submitted to the NRC- . . . (ii) When the NRC, at the time the request/report is submitted, plans to use the information in response to an NRC request from the Office Director level or above to resolve an identified safety, safeguards, or environmental issue, or to assist the NRC in generic regulatory improvements or efforts (e.g., rules, regulatory guides, regulations, policy statements, generic letters, or bulletins).”

NRC endorsement and subsequent industry implementation or utilization of the Topical Report on the Methodology for Fuel Qualification for Dry Storage Systems will result in generic regulatory improvements allowing for optimized allocation of resources on issues of greatest safety significance.

If you have any questions, please contact me at 856-797-0900 ext. 3659.

Sincerely,

Dr. Stefan Anton  
Vice President of Engineering,  
Holtec International