

**SUSAN H. PERKINS**

*Senior Director, Nuclear Security & Incident Preparedness*

1201 F Street, NW, Suite 1100  
Washington, DC 20004  
P: 202.739.8016  
shp@nei.org  
nei.org



July 12, 2021

Ms. Cherish K. Johnson  
Chief Financial Officer  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Fee Exemption Request for NEI White Paper, "Enabling Remote Response for Members of an Emergency Response Organization"

**Project Number: TBD**

Dear Ms. Johnson:

The Nuclear Energy Institute (NEI)<sup>1</sup> has submitted a draft version of NEI White Paper, "Enabling Remote Response for Members of an Emergency Response Organization," for review by the staff of the U.S. Nuclear Regulatory Commission (NRC) to support public meeting engagements leading to an eventual endorsement of the document. The white paper provides guidance that may be used by a power reactor licensee to enable selected members of an Emergency Response Organization (ERO) to respond to an emergency remotely (i.e., from a location other than the assigned emergency response facility).

Pursuant to the provisions of 10 CFR 170.11, "Exemptions," NEI requests a fee waiver for the NRC's review of the white paper, including reviews of any subsequent submittals necessary to address staff review comments. The 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." NEI plans to make the final version of the white paper available for use by both members and non-members; therefore, NRC review and endorsement of the white paper will promote a consistent approach to the implementation of a remote ERO response by power reactor facilities. This outcome will increase the efficiency of licensing actions (e.g., staff review of License Amendment Requests related to this topic) and emergency preparedness inspection activities performed under the Reactor Oversight Process.

---

<sup>1</sup> The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to 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 and engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations involved in the nuclear energy industry.

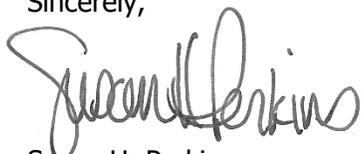
Ms. Cherish Johnson

July 5, 2021

Page 2

Questions concerning this request should be directed to Mr. Zachary Smith (570-640-7795 or [zas@nei.org](mailto:zas@nei.org)).

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Perkins". The signature is fluid and cursive, with the first name "Susan" being more prominent than the last name "Perkins".

Susan H. Perkins

c: Mr. Jessie Quichocho, NSIR/DPR/RLB, NRC  
Mr. Ray Hoffman, NSIR/DPR/RLB, NRC  
NRC Document Control Desk