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Senior Director, New Reactors

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August 30, 2021

Ms. Andrea Veil
Director, Office of New Reactors
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: NEI 21-07, Revision 0, "Technology Inclusive Guidance for Non-Light Water Reactors Safety Analysis Report Content for Applicants Utilizing NEI 18-04 Methodology"

Project Number: 689

Dear Ms. Veil:

On behalf of the nuclear energy industry, in support of continued ongoing interactions between the industry Technology Inclusive Content of Application Project working group and the NRC staff, the Nuclear Energy Institute (NEI)¹ is forwarding to the U.S. Nuclear Regulatory Commission (NRC) the attached report NEI 21-07, Rev 0, "Technology Inclusive Guidance for Non-Light Water Reactors Safety Analysis Report Content for Applicants Utilizing NEI 18-04 Methodology." These ongoing interactions are intended to support NRC's review and development of regulatory guidance with the ultimate goal of obtaining NRC endorsement of NEI 21-07. Based on anticipated interactions with the NRC, and the potential need for additional refinements to NEI 21-07, Rev 0, NEI intends to provide Revision 1 to this document before formally requesting NRC review and endorsement.

Over the last several years the industry's Advanced Reactor Regulatory Task Force has worked in close collaboration with the Southern Company-led Licensing Modernization Project to develop the guidance. In addition, there have been numerous meetings with NRC staff and this feedback has been incorporated into the current NEI document. The document has further incorporated input from the NEI Advanced Reactor Regulatory Task Force as well as benefiting from tabletop exercises with advanced reactor developers.

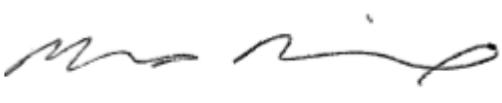
¹ The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial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

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NEI and the nuclear industry view the development of NEI 21-07 and NRC's review and endorsement via regulatory guide as an essential step to creating a streamlined and predictable licensing pathway to deployment for advanced reactors. Significant time and resources have been devoted to this effort by both the industry and the NRC. As the industry continues its interaction with the NRC on this important topic, NEI urges the NRC to identify areas where the staff is contemplating the need to provide clarifications and exceptions in its endorsement of the NEI guidance. This will provide a better understanding of the staff's position and will clearly identify the topics for industry focus moving forward.

Thank you for your time and attention to this important matter. If you have any questions or require additional information, please contact me (mrn@nei.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Mr. Nichol", enclosed in a thin black rectangular border.

Marcus R. Nichol

Attachment

c: Robert Taylor, NRR, NRC
Mohammed Shams, NRR, NRC
Joseph Sebrosky, NRR, NRC
Eric Oesterle, NRR, NRC
NRC Document Control Desk