

**ROD MCCULLUM**

*Sr. Director, Decommissioning and Used Fuel*

1201 F Street, NW, Suite 1100  
Washington, DC 20004  
P: 202.739.8082  
rxm@nei.org  
nei.org



August 19, 2022

Mr. Joseph E. Donoghue  
Director, Division of Reactor Safety Systems  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Request for Review and Endorsement of NEI 16-03, *Guidance for Monitoring of Fixed Neutron Absorbers in Spent Fuel Pools*, Revision 1, Dated August 2022

**Project Number: 689**

Dear Mr. Donoghue:

The Nuclear Energy Institute (NEI)<sup>1</sup>, on behalf of its members, is submitting NEI 16-03 Revision 1, "Guidance for Monitoring of Neutron Absorbers in Spent Fuel Pools," [Ref. 1, attached] for NRC review and endorsement. NEI 16-03 Revision 0 was originally prepared at NRC's request in response to Generic Letter (GL) 2016-01 [Ref. 2]. Revision 0 was endorsed by NRC [Ref. 3] in March of 2017. Revision 1 of this guidance updates the monitoring program options provided to licensees to include EPRI's industrywide learning aging management program (i-LAMP). The i-LAMP program is described in detail in a recently published EPRI Report [Ref. 4, attached]. A fee waiver request for this review was granted on June 22, 2021 [Ref. 5].

Sincerely,

A handwritten signature in black ink, appearing to read "Rod McCullum", is written over a light blue horizontal line.

Rod McCullum

References:

- [1] NEI 16-03 Revision 1, *Guidance for Monitoring of Fixed Neutron Absorbers in Spent Fuel Pools*, August 2022 (Attached).

---

<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.

Joseph E. Donoghue

August 19, 2022

Page 2

- [2] NRC Generic Letter 2016-01: Monitoring of Neutron-Absorbing Materials in Spent Fuel Pools, April 7, 2016 (ML16097A169).
- [3] Final Safety Evaluation for Nuclear Energy Institute Topical Report NEI 16-03, Guidance for Monitoring of Fixed Neutron Absorbers in Spent Fuel Pools (CAC NO. MF8122), March 3, 2017 (ML16354A487).
- [4] Industrywide Learning Aging Management Program (i-LAMP): Global Neutron Absorber Material Monitoring Program for Spent Fuel Pools. EPRI, Palo Alto, CA: 2022. 3002018497 (attached).
- [5] Letter, Cherish K. Johnson to Nima Ashkeboussi, June 22, 2021 (ML21146A261).

#### Attachments

c: Mr. Steven Bloom, NRC/NRR  
Mr. Matthew Yoder, NRC/NRR  
Ms. Leslie Fields, NRC/NRR