



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

September 22, 2023

Mr. Robert Iotti, Project Manager  
ARC Clean Technology  
Suite 900  
901 K Street, NW  
Washington, DC 20001

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION STAFF FEEDBACK AND  
OBSERVATIONS REGARDING ARC CLEAN TECHNOLOGY WHITE PAPER  
“REGULATORY TREATMENT OF NON-SAFETY SYSTEMS (RTNSS)” (EPID NO.  
L-2023-LRO-0024)

Dear Mr. Iotti:

By letter dated April 4, 2023 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23094A291), ARC Clean Technology (ARC) submitted to the U.S. Nuclear Regulatory Commission (NRC) staff’s review a white paper (WP) entitled “Regulatory Treatment of Non-Safety Systems (RTNSS).” The WP provides an overview and description of ARC’s current approach to the RTNSS.

The NRC staff was asked to perform a review of this WP and provide written feedback on the WP. Additionally, ARC also requested responses to three specific questions that were posed to the NRC staff during a May 3, 2023, clarification call regarding the WP. The NRC staff’s feedback and observations are provided in the enclosure to this letter.

The enclosure to this letter contains Proprietary Information.  
When separated from the enclosure, this letter is  
DECONTROLLED.

R. Iotti

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If you have any questions regarding this matter, please contact Stephanie Devlin-Gill at 301-415-5301 or via email at [Stephanie.Devlin-Gill@nrc.gov](mailto:Stephanie.Devlin-Gill@nrc.gov).

Sincerely,

*/RA/*

William Jessup, Chief  
Advanced Reactor Licensing Branch 1  
Division of Advanced Reactors and Non  
Power Production and Utilization Facilities Office  
of Nuclear Reactor Regulation

Project No.: 99902103

Enclosure:  
As stated

cc: ARC Clean Technology ARC-100  
via GovDelivery

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R. Iotti

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**ADAMS Accession Nos.:**

**Package: ML23265A157**

**Letter: ML23265A160**

**Public Enclosure: ML23265A170**

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