



September 10, 2024

Mr. Owen F. Barwell Chief Financial Officer U.S. Nuclear Regulatory Commission Washington, DC 20555-0001

Subject: Fee Exemption Request for Review and Endorsement of Topical Report EPRI ANT LR 2024-03 "Nuclear Facility Separation"

Dear Mr. Barwell:

On September 10, 2024, EPRI submitted topical report EPRI ANT LR 2024-03, "Nuclear Facility Separation," for review and endorsement by the U.S. Nuclear Regulatory Commission (NRC). This report documents regulatory implications of separation of the nuclear facility portion of a nuclear plant from adjacent facilities. The goal is to focus regulatory review and oversight on those portions of the nuclear plant with the potential to impact public health and safety.

On behalf of its members, EPRI requests that NRC's review of EPRI ANT LR 2024-03, including any subsequent submittals necessary to address staff review comments, be granted a fee waiver pursuant to 10 CFR 170.11. 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." NRC review and endorsement will provide applicants with an approved generic methodology for documenting nuclear facility separation and applying it to the demonstration of compliance with NRC regulations. This outcome will increase the efficiency of NRC licensing and inspection activities associated with facilities choosing to implement the methodology.

Nuclear facility separation¹ formalizes the physical and functional separation between the nuclear reactor (and associated structures, systems, and components) and adjacent facilities associated with energy production and other functions. Applying the EPRI methodology has the potential to achieve efficiencies in licensing and oversight for both applicants and the NRC. It is anticipated there will be many license applications for new and advanced reactors over the next decade and beyond. Processing these applications and providing oversight for the facilities once licensed will require extensive resources from applicant and regulator alike.

¹ Nuclear facility separation is discussed in further detail in EPRI Report 3002026499 "Technical Methodology to Demonstrate the Separation of Nuclear Facilities from Adjacent Facilities" (2023).

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Many of these applicants should be in a position to apply nuclear facility separation and realize benefits from it. Realizing efficiencies in the licensing and oversight processes via nuclear facility separation will benefit all parties involved and will help ensure that nuclear energy is able to contribute positively to meeting clean energy goals for the United States.

EPRI members, both U.S. and international, fund efforts such as the development of EPRI ANT LR 2024-03. EPRI ANT LR 2024-03 is nonproprietary and will be available for use by any applicant in the United States. Moreover, while this topical report is specifically applicable only to U.S.-regulated nuclear plants, there is international interest in deriving benefits from nuclear facility separation. Thus, the NRC review of the topical report will also contribute to international collaborative efforts to enable nuclear energy deployment worldwide.

If you have any questions related to this request, please contact EPRI project manager Eric Thornsbury at ethornsbury@epri.com or 202-293-6347.

Sincerely,

Craig Stover Senior Program Manger EPRI Advanced Nuclear Technology Program

cc: E. Thornsbury, EPRI K. Roche, NRR/DANU/UAL2 M. Wentzel, NRR/DANU/UAL2