

February 7, 2025

Ms. Theresa V. Clark  
Director, Division of Safety Systems  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** NEI Support for NRC Acceptance and Review of Studsvik CMS5 Supplement 1

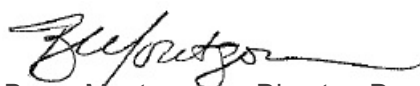
**Project Number: 689**

Dear Ms. Clark:

The Nuclear Energy Institute (NEI)<sup>1</sup>, on behalf of its members, would like to express support for the recent application submitted by Studsvik Scandpower requesting NRC review and approval of Supplement 1 to CMS5 Generic PWR Topical Report SSP-14-P01/028-TR<sup>2</sup>. Supplement 1 will extend the range of applicability of the CMS5 Generic PWR Topical Report to higher enrichment, higher burnup pressurized water reactor (PWR) fuels. This methodology directly supports industry initiatives to implement extended power uprates and adopt 24-month refueling cycles at operating reactors. NEI is aware that a number of NRC licensees are preparing applications for submittal within the next 12-18 months that will rely, in part, on the Studsvik Scandpower Core Management System. NEI encourages NRC to promptly accept this topical report for review and to complete the review in a timely fashion.

If you have any questions on this matter, please contact me at [bsm@nei.org](mailto:bsm@nei.org).

Sincerely,



Bruce Montgomery, Director, Decommissioning & Used Fuel

Cc: Ms. Laura A. Dudes (NRR)  
Mr. Gregory Bowman (NRR)  
Mr. Vic G. Cusumano (NRR/DSS)

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<sup>1</sup> The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

<sup>2</sup> Letter from Phil Sharpe, Studsvik Scandpower to NRC, date January 28, 2025, "Studsvik Scandpower, Inc. Request for Approval of Topical Report SSP-14-P01/028-TR Supplement 1, Generic Application of the Studsvik Scandpower Core Management System to Pressurized Water Reactors: Supplement for Extended Enrichment, Burnup, and SMRs," ML25028A255, ML25028A256.