



CHIEF FINANCIAL
OFFICER

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

August 11, 2025

Mr. Spencer Klein, Sr. Project Manager
New Nuclear Energy Institute
1201 F Street NW, Suite 1100
Washington, DC 20004

SUBJECT: RESPONSE TO THE NUCLEAR ENERGY INSTITUTE'S REQUEST FOR A
FEE EXEMPTION FOR NEI 25-06 "GUIDANCE FOR IMPLEMENTING THE
REQUIREMENTS OF 10 CFR PART 52 FOR EARLY SITE PERMIT
RENEWALS", REVISION 0

Dear Mr. Klein:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your letter dated July 1, 2025, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML25182A349), requesting a fee exemption under Title 10 of the *Code of Federal Regulations* (10 CFR) 170.11(a)(1)(ii) for the NRC's review and endorsement of Nuclear Energy Institute (NEI) 25-06, "Guidance for Implementing the Requirements of 10 CFR Part 52 for Early Site Permit Renewals," Revision 0, including all associated review activities, such as meetings and supplemental submittals. Based on the following analysis, I am granting your request for a fee exemption under 10 CFR 170.11(a)(1)(ii) for the NRC's review of NEI 25-06, Revision 0. This fee exemption is only applicable to Revision 0 and does not apply to the NRC's review of future submissions of NEI 25-06.

The NRC has established regulations for the granting of fee exemptions under 10 CFR 170.11, "Exemptions." An interested person may apply for an exemption under 10 CFR 170.11 in accordance with 10 CFR 170.5, "Communications."¹ The NRC staff reviewed your request based on the regulations in 10 CFR 170.11(a)(1)(ii) and 10 CFR 170.11(d).

Section 170.11(a) states:

No application fees, license fees, renewal fees, inspection fees, or special project fees shall be required for: (1) A special project that is a request/report submitted to the NRC— . . . (ii) When the NRC, at the time the request/report is submitted, plans to use the information to assist the NRC in generic regulatory improvements or efforts (e.g., rules, regulatory guides, regulations, policy statements, generic letters, or bulletins).

¹ 10 CFR 170.5 provides, in part, that "All communications concerning the regulations in this part should be addressed to the NRC's Chief Financial Officer, either by mail to the U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; by hand delivery to the NRC's offices at 11555 Rockville Pike, Rockville, Maryland; or, where practicable, by electronic submission, for example, via Electronic Information Exchange, or CD-ROM."

Section 170.11(d) states:

All fee exemption requests must be submitted in writing to the Chief Financial Officer in accordance with § 170.5, and the Chief Financial Officer will grant or deny such requests in writing.

In your letter, you stated that NEI believes that the process for renewal of Early Site Permits (ESP) should align with recent NRC efforts to implement efficient, timely and predictable licensing, and should be analogous to other NRC processes, like extension requests for construction permits. To this end, you stated that NEI has proposed an alternate renewal pathway in Appendix A of NEI-25-06, Revision 0 that mirrors the NRC's construction permit extension process under 10 CFR 50.55(b) and would significantly reduce time, effort and cost for the NRC and the applicant. You stated that while this approach would require an exemption from current Part 52 regulations, it would allow applicants to submit a letter requesting an extension on the basis that no significant changes to the authorization made in the original ESP have occurred that impact public health, safety, or environmental conditions. As such, you stated that endorsing NEI 25-06, Revision 0 would provide a predictable regulatory path for applicants seeking to reduce regulatory and financial uncertainties when planning for the future of a potential project site, advance the NRC's objectives for regulatory clarity and efficiency, and support the development of regulatory guidance necessary for new reactor deployment.

The NRC has issued six Early Site Permits (ESP) since 2007 that have a term of 20 years. Within the next two years, the NRC anticipates that three ESP holders will submit renewal applications consistent with requirements in 10 CFR 52.29. The NRC staff is aware that ESP holders may wish to seek an exemption from the ESP renewal requirements because of the economic costs associated with updating information and data in the ESP renewal application and then updating the information and data again when the ESP holder pursues a construction permit or combined license.

The NRC staff plans to improve its regulatory activities by using information in NEI 25-06 to develop ESP renewal guidance, which may include endorsement of NEI 25-06. On July 22, 2025, the NRC held a public meeting to discuss the NEI guidance for implementing the requirements in 10 CFR Part 52 for ESP renewal. The NRC staff anticipates that the guidance will support an ESP holder seeking renewal of its permit by including considerations for streamlining the review consistent with the NRC mission to enable safe and secure use of nuclear energy technologies through efficient and reliable licensing for the benefit of society and the environment.

Therefore, I am granting your request for a fee exemption request under 10 CFR 170.11(a)(1)(ii) for the NRC's review of NEI 25-06, Revision 0, because this revision will assist the NRC with generic regulatory improvements or efforts. However, this approval is not applicable to any future revisions of NEI 25-06. If NEI ultimately submits future revisions for review, NEI may submit a fee exemption request for the endorsement review at that time. Consistent with its regulations, the NRC will make an evaluation of a fee exemption request for NRC review of a document at the time such document is submitted to NRC for review.

If you have any technical questions regarding this matter, please contact Carolyn Lauron at 301-415-2736. For any fee-related questions, please contact Billy Blaney at 301-415-5092.

Sincerely,

A handwritten signature in cursive script that reads "Christopher Carroll".

Signed by Carroll, Christopher
on 08/11/25

Christopher D. Carroll
Acting Chief Financial Officer

SUBJECT: RESPONSE TO THE NUCLEAR ENERGY INSTITUTE'S REQUEST FOR A FEE EXEMPTION FOR NEI 25-06 "GUIDANCE FOR IMPLEMENTING THE REQUIREMENTS OF 10 CFR PART 52 FOR EARLY SITE PERMIT RENEWALS", REVISION 0, DATED: AUGUST 11, 2025

DISTRIBUTION: OCFO-25-00086

NAridi, OCFO

MVelasquez, OCFO

EXTERNAL DISTRIBUTION:

spk@nei.org

ADAMS Accession Number: ML25191A042 Package; ML25191A043 Letter

OFFICE	OCFO/DOB	OCFO/DOB	NRR/DNRL	NRR/DNRL
NAME	BBlaney	CGalster	CLauron	MJardaneh
DATE	07/10/2025	07/16/2025	07/14/2025	07/14/2025
OFFICE	NRR/DNRL	OGC	OCFO/DOC	OCFO/DOC
NAME	MSampson	CRyan ^{*NLO}	RMorton	MBlair
DATE	07/16/2025	07/25/2025	07/28/2025	07/25/2025
OFFICE	OCFO/DOB	OCFO/DOB	OCFO/DOB	DCFO
NAME	JAreas	LYee	MNeville	DD'Abate (Acting)
DATE	07/25/2025	07/29/2025	07/28/2025	08/06/2025
OFFICE	CFO			
NAME	CCarroll (Acting)			
DATE	08/11/2025			

OFFICIAL RECORD COPY