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UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

July 24, 2025

Mr. CJ Fong Vice President, Regulatory Affairs Blue Energy Global, Inc. 12358 Parklawn Drive, Suite 300 North Bethesda, MD 20852

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION RESPONSE TO BLUE

ENERGY GLOBAL, INC.'S REQUEST TO REVIEW WHITE PAPER BE-IMSWP-02-P, "BLUE ENERGY INTEGRATED MONOPILE SYSTEM,"

REVISION 0 (EPID: L-2025-LRM-0072)

Dear Mr. Fong,

By letter dated May 30, 2025, Blue Energy Global, Inc. (Blue Energy) submitted to the U.S. Nuclear Regulatory Commission (NRC) a White Paper titled BE-IMSWP-02-P, "Blue Energy Integrated Monopile System," Revision 0 (Agencywide Documents Access and Management System Accession No. ML25150A388). The public version of the IMS white paper can be found at ML25150A390.

Blue Energy stated that this white paper presents a summary of the preliminary requirements for the Blue Energy Integrated Monopile System™ (IMS) related to its design basis and safety criteria. The IMS is a large, cylindrical structure that is similar to a shield building. The information contained in the white paper is based on preliminary design information and might evolve as plant design progresses. The white paper is intended to provide the NRC staff an overview of the IMS as it is unique to Blue Energy's Plant concept. Future regulatory submittals will contain additional details for portions of the IMS to support NRC review and approval of certain design features. Blue Energy requests feedback on the preliminary design features described in this white paper but does not request review and approval of any IMS features at this time.

Enclosure to this letter contains Proprietary information. When separated from the enclosure this document is "DECONTROLLED."

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Blue Energy has outlined the scope of this report as follows:

- A high-level regulatory evaluation and a description of Blue Energy's intended compliance with relevant NRC requirements.
- A high-level regulatory basis specific for the approaches that will implement the design, construction and analyses of the Blue Energy IMS.
- Overall Safety Design Criteria, and additional guidelines for the analysis and design of the IMS, including the development of site-specific geotechnical and seismic design parameters.
- Overall Design Basis requirements, acceptance criteria, and additional guidelines for the evaluation of potential hazards.

The NRC staff has completed its assessment of the white paper and identified areas where additional details may be necessary as outlined in the enclosures to this letter. The proprietary and non-proprietary versions of the document containing NRC staff's observations are in Enclosures 1 and 2, respectively.

If you have questions related to this matter, please contact Lead Project Manager Prosanta Chowdhury at (301) 415-1647 or via email at Prosanta.Chowdhury@nrc.gov.

Sincerely,

Signed by Jardaneh, Mahmoud on 07/24/25

Mahmoud Jardaneh, Chief New Reactor Licensing Branch Division of New and Renewed Licenses Office of Nuclear Reactor Regulation

Project No.: 99902137

Enclosures:

1. NRC staff feedback on
Blue Energy White Paper
BE-IMSWP-02-P,
"Blue Energy Integrated
Managila System." Payisian 0 (Pro

Monopile System," Revision 0 (Proprietary)

2. NRC staff feedback on
Blue Energy White Paper
BE-IMSWP-02-P,
"Blue Energy Integrated
Monopile System,"
Revision 0 (Non-Proprietary)

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> GLOBAL, INC.'S REQUEST TO REVIEW WHITE PAPER BE-IMSWP-02-P, "BLUE ENERGY INTEGRATED MONOPILE SYSTEM," REVISION 0 (EPID: L-

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DATED: JULY 24, 2025

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Blue Energy Global, Inc., GovDelivery

ADAMS Accession Nos.: Package: ML25199A174 Cover Letter: ML25199A179

Enclosure 1: ML25199A180 (Proprietary) Enclosure 2: ML25203A180 (Non-proprietary)

*via e-Concurrence **NRR-106**

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