



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

July 28, 2025

Spencer P. Klein
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Nuclear Energy Institute
1201 F St., NW Suite 1100
Washington, DC 20004-1218

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION RESPONSE TO NUCLEAR ENERGY INSTITUTE 25-06, "GUIDANCE FOR IMPLEMENTING THE REQUIREMENTS OF 10 CFR PART 52 FOR EARLY SITE PERMIT RENEWAL"

Dear Mr. Klein,

This letter acknowledges the Nuclear Energy Institute's (NEI's) June 9, 2025, letter to the U.S. Nuclear Regulatory Commission (NRC) titled, "NEI Guidance for Implementing the Requirements of 10 CFR Part 52 for Early Site Permit Renewal."¹ The NEI letter and its attachment contain proposals to provide a predictable and efficient renewal process for early site permits (ESPs), recognizing that several ESPs are nearing their expiration.

The NRC staff agrees with the high-level concepts outlined in your letter and the staff has not identified any fundamental gaps with the NRC's ongoing and planned activities that would deter implementation of the proposal as a framework to provide a graded approach for preparing ESP renewal applications. Furthermore, the staff agrees that an industry pilot of the approach in Appendix A, "NEI Position on Alternate Approach to ESP Renewal," would be an effective next step for timely engagement on this topic.

The NRC staff is committed to an efficient, timely and predictable process for renewal of ESPs. The ESP resolves site safety, environmental protection, and emergency preparedness issues independent of a specific nuclear plant design, which can then be referenced in a future construction permit or combined license application. The staff agrees that further clarity on the necessary level of detail and appropriate timing for bringing ESP information up to date would help facilitate future ESP renewal applications.

¹ Letter from S. Klein to M. Sampson, "NEI Guidance for Implementing the Requirements of 10 CFR Part 52 Early Site Permit Renewal," dated June 9, 2025, Agencywide Documents and Access Management System (ADAMS) Accession No. ML25171A132.

Should you have any questions on this matter, please contact please contact Carolyn Lauron at 301-415-2736 or via email at Carolyn.Lauron@nrc.gov.

Sincerely,



Signed by Sampson, Michele
on 07/28/25

Michele Sampson, Director
Division of New and Renewed Licenses
Office of Nuclear Reactor Regulation

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