

ARC/NRC-PM-012

February 19, 2026

US Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Subject: ARC Clean Technology, Inc. (ARC)  
    Submittal of Addendum to the ARC-100 – Alternate Shutdown System – Why it is Not  
    Needed White Paper

References: [1] ARC Clean Technology, Inc , "ARC-100 – Alternate Shutdown System- Why It Is  
    Not Needed White Paper", CSRS-004, Revision 1.0, January 17, 2025  
    [2] U.S. Nuclear Regulatory Commission Staff Feedback Regarding ARC Clean  
    Technology , Inc , "ARC-100 – Alternate Shutdown System- Why It Is Not  
    Needed White Paper" Revision 1.0 (EPID No. L-2025-LRO-0013), December  
    19,2025.

This letter transmits an Addendum to Reference [1] . This addendum provides information  
intended to be responsive to only two of the comments/suggestions contained in the NRC letter  
(Reference [2]). ARC requests the following feedback:

- (a) Is the proposed configuration of the safety rods assemblies sufficiently responsive to the  
NRC suggestion that the gap between the internal sheath surrounding the absorber bundle and  
the external hexagonal duct be increased, and;
- (b) Is the description of the operation of the rack and pinion drive mechanisms sufficiently clear  
to show that the safety rod is not mechanically restrained from dropping in the core upon loss of  
power.

The attached enclosure provides the Addendum as well as its redacted version. If you have any  
questions or need any additional information, please contact me at [riotti@arc-cleantech.com](mailto:riotti@arc-cleantech.com) or  
(732) 890-3602; or Raymond Burski, ARC 100 Licensing Director at [rburski@arc-cleantech.com](mailto:rburski@arc-cleantech.com)  
or (504) 909-6436.

Sincerely,

A handwritten signature in black ink that reads "Robert Iotti". The signature is written in a cursive, slightly slanted style.

Robert Iotti

ARC-100 Project Manager  
ARC Clean Technology, Inc.

Enclosures: ARC-100 Regulatory Engagement Plan, Revision 1

cc (w/enclosure):

Stephanie Devin-Gill Senior Project Manager, NRR/DANU/UAL1

Josh Borromero, Chief, NRR/DANU/UARP

Kaattrin Abbott, DOE Program & Project Manager