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LTR-NRC-26-5
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Subject: Westinghouse's Request for Exemption from NRC Review Fees Associated with Westinghouse Topical Report WCAP-16996-P/NP, Revision 1, Supplement 3, Revision 0, "Extension of the FULL SPECTRUM LOCA (FSLOCA) Evaluation Methodology to Perform Analysis of High Burnup Fuel."

- References:
1. LTR-NRC-25-59, "Submittal of Westinghouse Topical Report WCAP-16996-P/NP, Revision 1, Supplement 3, Revision 0, "Extension of FULL SPECTRUM LOCA (FSLOCA) Evaluation Methodology to Perform Analysis of High Burnup Fuel." Dec. 29, 2025, ADAMS Accession No.: ML25363A148.
 2. WCAP-16996-P/NP-A, Revision 1, "Realistic LOCA Evaluation Methodology Applied to the Full Spectrum of Break Sizes (FULL SPECTRUM LOCA Methodology)," Nov. 30, 2016, ADAMS Accession No.: ML16343A238.
 3. Memorandum from Annette L. Vietti-Cook to Daniel H. Dorman, "Staff Requirements – SECY-21-0109 – Rulemaking Plan on Use of Increased Enrichment of Conventional and Accident Tolerant Fuel Designs for Light-Water Reactors," Mar. 16, 2022, SRM-SECY-21-0109, ADAMS Accession No.: ML22075A103.
 4. Regulatory Basis Document for Public Comment, "Increased Enrichment of Conventional and Accident Tolerant Fuel Design for Light-Water Reactors, RIN Number: 3150-AK79, NRC Docket ID: NRC-2020-0034," Sept. 30, 2023, ADAMS Accession No.: ML23032A504.
 5. WCAP-16996-P/NP, Revision 1, Supplement 1, Revision 0, "Extension of FULL SPECTRUM™ LOCA (FSLOCA™) Evaluation Methodology to 2-loop Westinghouse Pressurized Water Reactors (PWRs) with Information to Satisfy Limitations and Conditions Specific to 2-loop Plant Types," Feb. 25, 2025, ADAMS Accession No.: ML25057A397.

Dear Chief Financial Officer:

The purpose of this letter is to request a fee exemption associated with Westinghouse Electric Company LLC (Westinghouse) Topical Report WCAP-16996-P/NP, Revision 1, Supplement 3, Revision 0, "Extension of the FULL SPECTRUM LOCA (FSLOCA) Evaluation Methodology to Perform Analysis of High Burnup Fuel" that was submitted to the NRC for review and approval on December 29, 2025 (Reference 1). WCAP-16996-P/NP, Revision 1, Supplement 3, Revision 0 extends the applicability of the evaluation methodology presented in WCAP-16996-P/NP, Revision 1 (Reference 2) to high burnup operation. WCAP-16996-P/NP, Revision 1, Supplement 3, Revision 0 will provide the NRC staff with information to support extended fuel burnup, inclusive of fuel enrichment above 5 wt%. This methodology supports industry-wide efforts to enable higher-burnup fuel designs and higher initial fuel rod enrichments.

As described in SRM-SECY-21-0109 (Reference 3), the Commission directed the NRC staff to address issues relevant to higher enrichment and higher burnup fuels as part of the rulemaking activity to enable the use of increased enrichment fuel in light-water reactors. In response, the NRC staff issued a regulatory basis document (Reference 4) describing rulemaking alternatives regarding increased enrichment for conventional and accident tolerant fuel designs. Providing this information during the ongoing rulemaking process informs the staff of industry efforts to holistically analyze high burnup fuel, thus enabling the staff to make informed decisions in selecting the best alternative for the rulemaking and in developing the draft rule language. Westinghouse believes that NRC staff

review of this topical report concomitant with the rulemaking activity will further enhance the NRC staff's understanding of industry efforts to analyze high burnup fuel, inclusive of fuel enrichment above 5 wt%, and therefore further inform the rulemaking process.

If approved, WCAP-16996-P/NP, Revision 1, Supplement 3, Revision 0 will support the analysis of high burnup fuel with the NRC-approved evaluation model provided in WCAP-16996-P/NP, Revision 1 and will optimize NRC efforts in its licensing and enforcement of its rules and regulations related to future high burnup reviews.

The NRC approved a fee exemption request under 10 CFR 170.11 for WCAP-16996-P/NP, Revision 1, Supplement 1, Revision 0, "Extension of FULL SPECTRUM™ LOCA (FSLOCA™) Evaluation Methodology to 2-loop Westinghouse Pressurized Water Reactors (PWRs) with Information to Satisfy Limitations and Conditions Specific to 2-loop Plant Types" (Reference 5) in 2025 for similar reasons to those listed above.

10 CFR 170.11, Exemptions, Section (a)(1)(ii) states in relevant part:

(a) No application fees, license fees, renewal fees, inspection fees, or special project fees shall be required for:

(1) A special project that is 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).

10 CFR 170.11(c) states:

For the purposes of (a)(1) of this section, a request for a fee exemption must be submitted to the Chief Financial Officer within 90 days of the date of the NRC's receipt of the request/report.

Westinghouse respectfully requests a fee exemption for WCAP-16996-P/NP, Revision 1, Supplement 3, Revision 0 since the review of this report will assist the NRC in its understanding of the evaluation methodologies available to analyze high burnup fuel inclusive of fuel enrichment above 5 wt%. By extending an approved methodology to high burnup fuels, the topical report will increase regulatory efficiency for both the NRC and industry when implementing licensing activities for high burnup fuels in response to the future rulemaking, therefore reducing the need for repetitive and resource intensive plant-specific methodology reviews. Although the subject topical report contains proprietary information, Westinghouse anticipates that the regulations and guidance the NRC staff will develop will not contain any proprietary information and will be publicly available.

Correspondence with respect to this request should be addressed to Jerrod A. Ewing, Manager, Operating Plants Licensing, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 1, Cranberry Township, PA 16066.

Thank you,

A handwritten signature in black ink that reads "Jerrod Ewing". The signature is written in a cursive, flowing style.

Jerrod Ewing, Manager
Operating Plants Licensing

cc: NRC Document Control Desk

Scott Krepel
Ekaterina Lenning
Damaris Marcano