

July 14, 2026

Christopher Carroll
Chief Financial Officer (Acting)
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Fee Exemption Request for NEI 26-03, Revision 0, “An Approach for the Assessment of Low Frequency Seismic Events as Part of a Risk-Informed Performance-Based Licensing Pathway”

Project Number: 689

Dear Mr. Carroll:

The Nuclear Energy Institute (NEI)¹, on behalf of its members, respectfully requests a waiver of fees associated with the U.S. Nuclear Regulatory Commission (NRC) staff’s review and potential endorsement of NEI 26-03, Revision 0, “An Approach for the Assessment of Low Frequency Seismic Events as Part of a Risk-Informed Performance-Based Licensing Pathway.”

NEI 26-03 provides an approach for the assessment of low-frequency seismic events within a risk-informed, performance-based licensing framework. The report was developed to address a disconnect between the seismic assessment approach described in NEI 18-04, *Risk-Informed Performance-Based Technology Inclusive Guidance for Non-Light Water Reactor Licensing Basis Development*, and traditional seismic design requirements while supporting implementation of the risk-informed, performance-based requirements and objectives of 10 CFR Part 53.

NEI submits this report in support of generic regulatory improvements and increased regulatory efficiency, consistent with the fee exemption provisions of 10 CFR 170.11(a)(1)(ii). Specifically, the content is intended to:

- Assist the NRC in establishing a consistent and transparent framework for advanced reactor risk assessments for seismic hazards;
- Support modernization efforts and technology-inclusive policies;
- Facilitate more predictable and streamlined regulatory reviews across the industry.

¹ The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI’s members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect and engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations involved in the nuclear energy industry.

The development of NEI 26-03 draws upon extensive industry collaboration. NEI believes this initiative directly contributes to the NRC's regulatory objectives and the broader public interest.

If you have any questions or require additional information, please contact me at jwf@nei.org or 202-256-0190.

Thank you for your consideration.

Sincerely,



Jon Facemire
Senior Project Manager, New Nuclear

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NRC Document Control Desk