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August 25, 2015

Jack Davis
Director, Japanese Lessons Learned Division
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Submittal of NEI 12-06, Revision 1: "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide"

Project Number: 689

Dear Mr. Davis:

NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide", was written to guide implementation of Order EA-12-049. The NRC documented its endorsement of revision 0 of NEI 12-06 in JLD-ISG-2012-01. Revision 1 of NEI 12-06 has been developed to incorporate:

- Guidance for the performance of flooding mitigating strategies assessments,
- Guidance for FLEX validation,
- References to white papers that address a number of technical issues, and
- Resolution of questions that have arisen during use of revision 0.

The content of revision 1 has been the subject of a number of meetings between the Staff and Industry. NEI believes that the version of NEI 12-06 attached to this letter addresses all comments that have been received to date. The purpose of this letter is to submit revision 1 for NRC endorsement. This document is not proprietary.

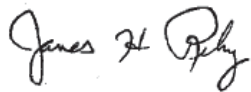
Consistent with other submittals supporting industry's response to Fukushima tier 1 activities, we believe NRC staff review of NEI 12-06 Revision 1 is exempt from the fee recovery provision contained in 10 CFR Part 170. This submittal supports implementation of Order EA 12-049 and completion of flooding mitigating strategies assessments. NRC reviews of such items are exempted under §170.11, Exemptions, Subpart (a) (1) (iii). This provision states, (a) "No application fees, license fees, renewal fees, inspection fees, or special project fees shall be required for...(1) A special project that is a request/report submitted to the NRC--(iii) As a means of exchanging information between industry organizations and the NRC for the specific purpose of supporting the NRC's generic regulatory improvements or efforts".

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If you have any questions about this information, please contact me at (202) 739-8137; jhr@nei.org.

Sincerely,

A handwritten signature in black ink, appearing to read "James H. Riley". The signature is fluid and cursive, with the first name "James" and last name "Riley" being clearly legible, and "H." as a small middle initial.

James H. Riley

Attachment

C: Jeremy Bowen, NRR/JLD/PPSD, NRC
 Mohamad Shams, NRR/JLD/PPSD/HMB, NRC
 Fukushima Response Steering Committee
 FLEX Core Group
 Fukushima Flooding Task Force
 Fukushima Points of Contact