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Director, Security

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November 8, 2016

Ms. Maureen E. Wylie
Chief Financial Officer
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Fee Exemption Request for NEI 05-05, *Controller Guideline for Force-on-Force Exercise Simulations*, Revision 5, Dated December 2015

Project Number: 689

Dear Ms. Wylie:

The Nuclear Energy Institute (NEI)¹, on behalf of the nuclear energy industry, submitted NEI 05-05, *Controller Guideline for Force-on-Force Exercise Simulations*, Revision 5, dated December 2015, on December 16, 2015, for NRC review and endorsement. NEI 05-05 is the guidance document used by the nuclear power industry to control force-on-force exercise simulations for both NRC evaluated and licensee annual evaluated exercises.

NEI requests that the NRC's review of NEI 05-05, and any future submissions of the guidance document be granted a fee waiver pursuant to the provisions of 10 CFR 170.11. This document meets the exemption requirement in 10 CFR 170.11(a)(1)(ii) in that it will "...assist the NRC in generic regulatory improvements or efforts (e.g., rules, regulatory guides, regulations, policy statements, generic letters, or bulletins)." In this case, the revision of this guidance supports increased regulatory stability and consistency in the conduct of NRC Force-on-Force inspections. The NRC and nuclear power industry would be co-beneficiaries of this guidance as the NRC has and will continue to use this document to support review of Force-on-Force inspections conducted in accordance with Inspection Procedures 71130.03 and 71130.05.

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

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Please contact me should you have any questions at (202) 739-8174; dk@nei.org.

Sincerely,

A handwritten signature in black ink, appearing to read "David R. Kline". The signature is stylized with a large "D" and "K".

David R. Kline

c: Mr. Michael C. Layton, NSIR/DSO, NRC
Mr. William H. Blaney, III, CFO/DC/ARB/FBT, NRC
NRC Document Control Desk