

February 2, 2018

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

**Subject:** Fee Exemption Request for NEI White Paper, "Determination of a Site-Specific Security Bounding Time"

**Project Number:** 689

Dear Ms. Wylie:

The Nuclear Energy Institute (NEI)<sup>1</sup> has submitted a white paper entitled, "Determination of a Site-Specific Security Bounding Time," for NRC review and endorsement. The white paper describes a process that a licensee may use to determine allowable credit for a tactical response by a law enforcement agency following a physical attack on a nuclear power plant.

NEI requests that the NRC's review of the white paper, including any subsequent submittals necessary to address staff review comments, be granted a fee waiver pursuant to the provisions of 10 CFR 170.11. The 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." In this case, NRC review and endorsement of the white paper will promote a consistent approach to determining credit for law enforcement tactical responses and increase the efficiency of inspection activities associated with the requirements of 10 CFR 73.55, "Requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage." In addition, the staff can use information in the paper to inform their evaluation of options for crediting law enforcement tactical responses as discussed in SECY-17-0100, "Security Baseline Inspection Program Assessment Results and Recommendations for Program Efficiencies."

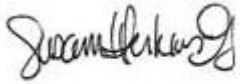
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<sup>1</sup> The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include 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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Questions concerning this request should be directed to Mr. David Young (202-739-8127 or [dly@nei.org](mailto:dly@nei.org)).

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Perkins-Grew". The signature is written in a cursive, flowing style.

Susan Perkins-Grew

c: Mr. James Andersen, NSIR/DPCP, NRC  
Ms. Alison Rivera, NSIR/DPCP/RSB, NRC  
NRC Document Control Desk