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May 16, 2018

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

Subject: Fee Exemption Request for NEI 05-05, *Force-on-Force Exercise Controller Responsibilities Guideline*, Revision 6

Project Number: 689

Dear Ms. Wylie:

The Nuclear Energy Institute (NEI)¹, on behalf of its members, will be submitting NEI 05-05, *Force-on-Force Exercise Controller Responsibilities Guideline*, revision 6 for endorsement. The guidance in this document addresses the knowledge and skills necessary to be a controller in both a licensee Force-on-Force (FOF) exercise, as well as the NRC evaluated FOF as part of the 71130.03 Inspection Procedure, *Contingency Response – Force-on-Force Testing*. FOF exercises are scripted to maximize realism; however, simulations are employed where necessary to assure the safety of the participants. NEI 05-05 provides acceptable simulations and control measures for a broad range of expected tactics. Revision 6 of NEI 05-05 was created, in part, to incorporate control elements previously included in Addendum 5 to NRC Inspection Procedure (IP) 71130.03, *Contingency Response – Force-on-Force Testing*. Addendum 5 was removed from the IP in January, 2017. Elements from Addendum 5 were incorporated into NEI 05-05 to enhance the control of FOF 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

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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requirement in 10 CFR 170.11(a)(1)(iii)(A) 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, NRC review and endorsement of revision 6 of NEI 05-05 will facilitate in the development of control measures associated with planned FOF scenarios and provide clarity to licensees on control attributes associated with Force-on-Force.

If you have any questions or require additional information, please contact AJ Clore at (202) 739-8025; ajc@nei.org or me.

Sincerely,

A handwritten signature in black ink, appearing to read "William R. Gross". The signature is fluid and cursive, with a long horizontal stroke at the end.

William R. Gross

c: Ms. Marissa Bailey, NSIR/DSO, NRC
Mr. Doug Huyck, NSIR/DSO, NRC
NRC Document Control Desk