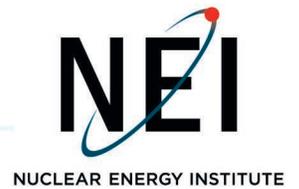


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September 22, 2023

Scott Tonsfeldt
Acting Technical Assistant
Division of Advanced Reactors and Non-Power Production and Utilization Facilities
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Request for Review and Meeting to Discuss Draft Nuclear Energy Institute Draft Technical Report NEI 23-01, "Operator Cold License Training Plan for Advanced Nuclear Reactors"

Project Number: 689

Dear Mr. Tonsfeldt:

The Nuclear Energy Institute (NEI)¹, on behalf of its members, is submitting Draft NEI 23-01, "Operator Cold License Training Plan for Advanced Nuclear Reactors," for NRC review. NEI 23-01 provides applicants for Advanced Nuclear Reactors with a standard plan to train and license operators before construction of the plant is complete. NRC review and endorsement of NEI 23-01 will allow applicants to reference this plan within their Advanced Reactor CP/COL application and reduce the time the staff needs to review the application.

NEI 23-01 currently reflects a change in the educational requirements for the Direct SRO candidates. To better explain why this change was made we have included a paper that lays out our reasoning for the change to help spur the discussion on this point. It is known that this change may be controversial, but we believe that taking this approach will help ensure the right workforce is available to operate these Advanced Nuclear Reactors and that they can be operated safely.

We request that the NRC review and conduct a meeting to discuss the draft technical report by October 30, 2023. The purpose of the meeting would be to solicit comments and observations from NRC staff on the

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.

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content of the draft technical report and to respond to any questions from the staff. We do plan to seek NRC endorsement in the future and would consider any feedback from the staff prior to finalizing the document and issuing it to the NRC for endorsement. NEI will submit a fee exemption request to support the NRC's review and meeting.

If there are any questions on this matter, please contact either me at sjy@nei.org or Marcus Nichol at mrn@nei.org.

Sincerely,



Stewart Yuen

Attachments: NEI 23-01, "Operator Cold License Training Plan for Advanced Nuclear Reactors," Draft Change to Education Requirement for Cold License Training for Direct SRO Candidates

c: Steven Lynch – DANU, NRR, NRC
NRC Document Control Desk