

From: [HOLTZMAN, Benjamin](#)
To: [Mohamed Shams](#)
Cc: [Andrea Veil](#); [Robert Taylor](#); [John Segala](#); [Joseph Sebrosky](#); [Michael Orenak](#)
Subject: [External_Sender] Transmittal of NEI 22-05 Revision A, "Technology Inclusive Risk Informed Change Evaluation (TIRICE) Guidance for the Evaluation of Changes to Facilities Utilizing NEI 18-04 and NEI 21-07"
Date: Friday, March 24, 2023 11:50:00 AM
Attachments: [03-24-23_NRC_NEI_22-05_Rev_A+Attach.pdf](#)

March 24, 2023

Mr. Mohammed Shams
Director, Division of Advanced Reactors and Non-Power Production and Utilization Facilities (DANU)
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Transmittal of NEI 22-05 Revision A, "Technology Inclusive Risk Informed Change Evaluation (TIRICE) Guidance for the Evaluation of Changes to Facilities Utilizing NEI 18-04 and NEI 21-07"

Project Number: 689

Dear Mr. Shams:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI) ^[1] is transmitting to the U.S. Nuclear Regulatory Commission (NRC) the attached interim revision of NEI 22-05, "Technology Inclusive Risk Informed Change Evaluation (TIRICE) Guidance for the Evaluation of Changes to Facilities Utilizing NEI 18-04 and NEI 21-07." This document reflects the work that industry's Advanced Reactor Regulatory Task Force has done in close collaboration with the Southern Company-led Licensing Modernization Project and Technology Inclusive Content of Application Project (TICAP) to develop the guidance. The document is being transmitted for review in advance of an upcoming public meeting for discussion and feedback.

The guidance and associated criteria in NEI 22-05 are intended to take the place of 10 CFR 50.59 for certain nuclear power reactors with a safety analysis based on the methodology endorsed in Regulatory Guide 1.233 (ML20091L698), "Guidance for a Technology-Inclusive, Risk-Informed, and Performance-Based Methodology to Inform the Licensing Basis and Content of Applications for Licenses, Certifications, and Approvals for Non-Light-Water Reactors." The guidance and criteria would be invoked by a license condition in combination with an exemption, in whole or in part, to 10 CFR 50.59 - predicated on the same logic as 10 CFR 50.59.

Thank you for your time and attention to this important matter. If you have any questions or require additional information, please contact me (bah@nei.org).

Sincerely,

Benjamin A. Holtzman
Program Advisor,
New Reactors

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^[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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