



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

July 18, 2025

Mr. CJ Fong  
Vice President, Regulatory Affairs  
Blue Energy Global, Inc.  
12358 Parklawn Drive, Suite 300  
North Bethesda, MD 20852

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION RESPONSE TO BLUE ENERGY GLOBAL, INC.'S REQUEST TO REVIEW WHITE PAPER BE-AIAWP-01-P, "ENHANCED DESIGN FEATURES AGAINST AIRCRAFT IMPACT WHITE PAPER," REVISION 0 (EPID: L-2025-LRM-0071)

Dear Mr. Fong,

By letter dated May 30, 2025, Blue Energy Global, Inc. (Blue Energy) submitted to the U.S. Nuclear Regulatory Commission (NRC) a White Paper (WP) titled BE-AIAWP-01-P, "Enhanced Design Features Against Aircraft Impact White Paper," Revision 0 (Agencywide Documents Access and Management System Accession No. ML25150A352). In the letter, Blue Energy stated that the enhanced design features of its Integrated Monopile System (IMS) would greatly reduce the risk to the public of a radiological release caused by an aircraft impact. The letter also stated that in addition to technical information, the white paper would present Blue Energy's regulatory approach for seeking an exemption from the requirements outlined in Title 10 of the *Code of Federal Regulations* (10 CFR) 50.150, "Aircraft impact assessment," for future license applications under 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities." If granted, this exemption would eliminate the need to conduct aircraft impact assessments for the Blue Energy IMS. Blue Energy further stated that the findings and conclusions of this white paper would serve as the technical basis for a future topical report and exemption request.

The NRC staff notes that the WP discusses the structural design features of Blue Energy's IMS relevant to aircraft impact resilience and the scope of this WP is limited to demonstrating that the IMS design features inherently satisfy the safety objectives of 10 CFR 50.150 and can serve as the basis for a future exemption request under 10 CFR 50.12, "Specific exemptions."

The NRC staff finds Blue Energy's approach to requesting an exemption from requirements in 10 CFR 50.150, supported by technical justification that meets the requirements of 10 CFR 50.12, to be reasonable. An exemption request should be submitted for staff review with or following a license application submittal.

If you have any questions, please contact Lead Project Manager Prosanta Chowdhury at (301) 415-1647 or via email at [Prosanta.Chowdhury@nrc.gov](mailto:Prosanta.Chowdhury@nrc.gov).

Sincerely,

/RA/

Mahmoud Jardaneh, Chief  
New Reactor Licensing Branch  
Division of New and Renewed Licenses  
Office of Nuclear Reactor Regulation

Project No.: 99902137

cc: Blue Energy Global, Inc.  
GovDelivery

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GLOBAL, INC.'S REQUEST TO REVIEW WHITE PAPER BE-AIAWP-01-P,  
"ENHANCED DESIGN FEATURES AGAINST AIRCRAFT IMPACT WHITE  
PAPER," REVISION 0  
DATED: JULY 18, 2025

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