

From: <bgutherman@acines.com>
To: <gmt1@nrc.gov>
Date: 09/20/2006 8:52:49 AM
Subject: 50.68 Rule Feedback

George,

Here are the comments I promised. I will call to discuss in additional detail the overall state of industry's thoughts on the new rule language.

These are all in the Background section of the technical basis:

Top of Page 2, 1st line: We believe licensees have been re-racking pools since the 70d rather than the 80s.

Page 3, 1st full paragraph: The second sentence implies that all dry storage casks have fixed neutron poisons. They do not. Some cask designs (e.g., VSC-24) do not.

Page 7, top line: Typo - "were" should be "where"

Page 7, 2nd full paragraph: Cask loading and unloading is not necessarily "conducted by licensed operators who are present during any fuel movement." Many sites do not require a licensed operator to be present for fuel moves in the spent fuel pool where cask loading takes place. These plants ensure the personnel performing these activities are appropriately trained and qualified. Some plants designate a separate position called "certified fuel handler."

Brian

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Subject: 50.68 Rule Feedback
Creation Date 9/20/2006 8:52:17 AM
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TWGWPO02.HQGWDO01
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