

Detroit Edison



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Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
U. S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, DC 20555-0001

Reference: Federal Register, Vol. 72, No. 54, Page 13313, dated March 21, 2007
(72 FR 13313)

Subject: Detroit Edison Comments on "Proposed Revisions to NUREG/BR-0006 and NUREG/BR-0007"

Detroit Edison, owner and operator of Fermi 2 Nuclear Power Plant, provides the following comments on the proposed revisions to NUREG/BR-0006 and NUREG/BR-0007 discussed in the referenced Federal Register notice.

1. NUREG/BR-0007, Revision 6: Section 1.5 states "Every report period, the licensee shall perform a reconciliation of the data reported to NMMSS compared to the projected balances developed by NMMSS. Generated balances are provided in reports obtained from the NMMSS operator...The reconciliation should be completed within 30 calendar days of when the licensee was notified of the discrepancy and include..."

The first two sentences imply that it is the licensee's responsibility to initiate the process to determine if there are any discrepancies between the data provided by the licensee and that obtained from the NMMSS operator. This is different from how it is stated in the Federal Register, Vol. 72, No. 24, Page 5351, dated February 6, 2007 (72 FR 5351). It is proposed that Section 1.5 be modified to clarify that the reconciliation process is initiated by the NRC and that the overall description of reconciliation is consistent with the definition of "reconciliation" in the CFR.

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B. Horn (bgh)

The proposed wording for Section 1.5 is as follows: "Every report period, a reconciliation shall be performed of the data that the licensee has reported to NMMSS to the projected material balances that have been developed by NMMSS. In accordance with the definition of "reconciliation" in the CFR, the licensees' reports are evaluated and compared by NRC to the projected balances by the NMMSS. The NMMSS projected balances are the NMMSS calculated material balances based on the transfer, receipt, or other adjustments reported to the NMMSS by the licensees during the previous reporting period. The process is considered complete when a licensee resolves any differences between the reported inventory and the inventory projected by the NMMSS database. Any differences are to be resolved by the licensee within 30 days of being notified of the discrepancy and include all accounts held by the licensee including holding accounts."

2. NUREG/BR-0006, Revision 7 and BR-0007, Revision 6: On page D-2, the definition of *Report Period* states "The report period is inclusive of defined dates (i.e., Oct. 01, 2005..."

It is recommended to change the "i.e." to "e.g.," since "i.e." implies that all licensees have to supply reports as of September 30, which is not the case. The intent for the report period being inclusive is clear, however, the dates given are an example.

Detroit Edison appreciates the efforts by NRC staff to develop clearly defined requirements for Nuclear Material Transaction and Material Status Reports, and the opportunity to provide comments prior to final issuance.

Should you have any questions or require additional information, please contact me at (734) 586-5197.

Sincerely,



Ronald W. Gaston
Manager – Nuclear Licensing