

## NRCREP Resource

**From:** KRICH Rod (AREVA NC Inc) [rod.krich.EXT@areva.com]  
**Sent:** Friday, July 25, 2008 1:49 PM  
**To:** NRCREP Resource  
**Cc:** KILLAR, Felix  
**Subject:** AREVA Comments on Draft Regulatory Guide DG-3033 (Proposed Revision 1 of Regulatory Guide 3.25, dated December 1974), "Standard Format and Content of Safety Analysis Reports for Uranium Enrichment Facilities"

**To:** Rulemaking, Directives, and Editing Branch  
Office of Administration  
U.S. Nuclear Regulatory Commission

AREVA appreciates the opportunity to comment on the subject Draft Guide (DG). AREVA supports and endorses the comments on the subject DG submitted by the Nuclear Energy Institute (NEI) by its letter dated July 25, 2008, "Draft Regulatory Guide DG-3033, 'Standard Format and Content of Safety Analysis Reports for Uranium Enrichment Facilities'." In particular, AREVA takes this opportunity to reiterate its support for the DG and to reinforce the NEI comment regarding the need to reconcile the difference in wording between Section A and Section C of the DG.

Specifically, the second paragraph of Section A, "Introduction," states in part that "...This regulatory guide endorses the standard format and content for SARs and ISA Summaries described in the current revision of NUREG-1520..." (emphasis added). However, the first paragraph of Section C, "Regulatory Position," states in part that "This regulatory guide endorses the method(s) of formatting and submitting a SAR or an ISA Summary for a uranium enrichment facility described in the current revision of NUREG-1520..." (emphasis added). The final Regulatory Guide should be clear and unambiguous in that it endorses the standard format and content for the SAR and ISA Summary described in NUREG-1520, "Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility." Accordingly, AREVA recommends that the identified statement in Section C of the DG be changes to match the identified statement in Section A of the DG.

If you have any questions, please contact me at 301-841-1701.

Regards,  
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