

NRCREP Resource

From: Couture, Gerard F. [CouturGF@westinghouse.com]
Sent: Thursday, October 23, 2008 7:32 AM
To: NRCREP Resource
Cc: Breeda Reilly; Nilda Rivera-Feliciano; Parr, Nancy B.; SCHLUETER, Janet; Gutman, Michele M.
Subject: DRAFT REGULATORY GUIDE DG-3031 COMMENTS

1) Section B, last paragraph describes situations where the NRC may approve license terms for less than the maximum 40 year time period authorized by the 2006 policy. The examples given may imply to the general public that NRC may only approve terms at less than the maximum in unique or new situations that are of some concern for a longer term operation. There are several other reasons that a licensee may chose to request a shorter term license renewal, or NRC may choose not to authorize the maximum time period.

Suggest this last sentence merely state "The NRC may approve license terms for less than 40 years on a case by case basis."

2) Sections A and B use the term "specific" information and "specific" guidance in several places when referencing NUREG-1520.

Suggest deleting the term "specific" because NUREG-1520 is only one suggested method for compliance with the Regulations.

3) Since NUREG-1520 already states in the Executive Summary that it serves as regulatory guidance for license applications and related documents, it appears that this additional Regulatory Guide is redundant and unnecessary.

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