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General Comment

Please see the attached letter for a comment regarding Draft Regulatory Guide DG□□□2004, 'Emergency Planning for Research and Test Reactors'.

Attachments

NRC-2010-0144-DRAFT-0004.1: Comment on FR Doc # 2010-07390

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May 28, 2010

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MS: TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

RE: Draft Regulatory Guide DG-2004, *Emergency Planning for Research and Test Reactors* (Docket ID NRC-2010-0144)

Mr. Lesar,

This letter has been written to submit a comment on Draft Regulatory Guide DG-2004, *Emergency Planning for Research and Test Reactors*, published in the Federal Register (Vol. 75, No. 62 / April 1, 2010). My comment regards Section C.3, which states "The licensee should consider implementing a notification process that will notify the NRC no later than 1 hour after it declares one of the emergency classes." This 1-hour reporting recommendation is inconsistent with the 24-hour reporting recommendation found in ANSI/ANS 15.1, *The Development of Technical Specifications for Research Reactors*. As is recommended in ANSI/ANS 15.1, most non-power reactors have a 24-hour reporting requirement within their technical specifications for the worst non-normal operational scenarios, including those involving a "release of radioactivity from the site above allowed limits." This standard has been in effect for decades, and it should be noted that the classification of events at research and test reactors are based on the dose incurred by the general public as a result of an off-site release. Therefore, ANSI/ANS 15.1 and current research reactor emergency plans are addressing this situation consistent with each other, with both implementing a 24-hour reporting criteria.

Because of the minimal decay heat and low inventory of radioactive materials, most safety analysis reports predict off-site dose to be below that found in 10 CFR 20.1301(a)(1). Any actions that protect the public health and safety occur in the control room by the operator within the first few minutes of an event because, unlike power reactors, even the worst-case events at a research and test reactor are not protracted (i.e., taking place over many hours or days) and therefore do not lend themselves to vulnerabilities in crisis management or confounding circumstances. Given that events at research and test reactors have little or no impact on public health and safety and are not protracted, recommending a 1-hour notification time for emergency situations at research and test reactors is unnecessary and inconsistent with the current recommendations found in ANSI/ANS 15.1.

If you have any questions, please do not hesitate to contact me at the address above.

Sincerely,

A. L. Kauffman

Andrew Kauffman
Associate Director, OSU Nuclear Reactor Lab