

5/19/2010  
BFR 28073

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**NRCREP Resource**

**From:** Patricia L. Campbell [patriciaL.campbell@ge.com]  
**Sent:** Monday, July 12, 2010 12:43 PM  
**To:** NRCREP Resource  
**Subject:** Response from "Comment on NRC Documents"

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Below is the result of your feedback form. It was submitted by

Patricia L. Campbell ([patriciaL.campbell@ge.com](mailto:patriciaL.campbell@ge.com)) on Monday, July 12, 2010 at 12:42:45

Document Title: DG-3039, STANDARD FORMAT AND CONTENT FOR EMERGENCY PLANS FOR FUEL CYCLE AND MATERIALS FACILITIES (proposed revision 1 to RG 3.67)

Comments: GEH Comments on DG-3039, STANDARD FORMAT AND CONTENT FOR EMERGENCY PLANS FOR FUEL CYCLE AND MATERIALS FACILITIES (proposed revision 1 to RG 3.67)

GEH provides the following comments for NRC consideration in finalizing Revision 1 of Regulatory Guide 3.67.

**GENERAL:**

The draft Regulatory Guide should reference applicable chapters of NUREG-1520, Standard Review Plan, for the Review of a License Application for a Fuel Cycle Facility.

**SPECIFIC COMMENTS:**

Page 2, 6th paragraph, second to last two sentences – RIS 2005-02 is referenced for guidance on process for making emergency plan changes; however, this RIS specifically applies to 10 CFR Part 50 facilities. Consider either of three options for addressing this apparent discrepancy: (1) revise RIS to include applicable regulations and guidance for affected facilities; (2) provide specific reference applicable to RG 3.67 facilities; or (3) revise sentence to indicate that RIS 2005-02 is for general guidance only and RG 3.67 affected facilities would not be expected to implement all of the guidance in RIS 2005-02.

Page 6, Section 2.1 paragraph 3 now references NUREG-1513 for integrated safety analysis guidance. This section should also reference NUREG-1520, which also provides guidance regarding performance of an integrated safety analysis.

Page 7, Section 3.1, paragraph 5 now segregates emergency classifications for onsite emergencies versus those required for offsite response (e.g., transportation accidents). NUREG-1520, Section 8.4.3.1.4(3), indicates that transportation accidents within one mile of the facility should be classified under the emergency plan. Final RG 3.67 should ensure consistency in the guidance in this instance. The NRC may consider whether to perform a comparison between documents to ensure consistency in other instances.

Page 8, Section 3.2.1, in the introductory paragraph, includes two items listed as (3). Change the second "(3)" to "(4)" for proper numbering.

Page 12, Section 5.1, new paragraph 2, addresses hostile action response and references NRC IN 2009-19, which references NEI 06-04. Both the IN and NEI documents specifically apply to 10 CFR Part 50 facilities, and the guidance is not clear on what is required of non-Part 50 facilities. Final RG 3.67 should clarify the intent of this guidance with respect to non-Part 50 facilities.

*SUNSI Review Complete*  
*Template = ADM-013*

*E-REDS = ADM-03*  
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