

2/14/2011  
76 FR 8383 (3)

# PUBLIC SUBMISSION

**As of:** March 18, 2011  
**Received:** March 16, 2011  
**Status:** Pending\_Post  
**Tracking No.** 80c094a1  
**Comments Due:** March 16, 2011  
**Submission Type:** Web

**Docket:** NRC-2011-0031

Interim Staff Guidance on Impacts of Construction of New Nuclear Power Plants on Operating Units at Multi-Unit Sites

**Comment On:** NRC-2011-0031-0001

Office of New Reactors; Interim Staff Guidance on Impacts of Construction of New Nuclear Power Plants on Operating Units at Multi-Unit Sites

**Document:** NRC-2011-0031-DRAFT-0004

Comment on FR Doc # 2011-03223

---

## Submitter Information

---

## General Comment

How does 10CFR50.79(a)(31) require protection of spent fuel in spent fuel pools during construction activity of a new plant? Most, perhaps all, NRC approved Technical Specifications have no LCO for spent fuel or for spent fuel pools.

What regulation protects the operating nuclear plant from construction impacts during construction of a new plant when all nuclear fuel has been removed from the 'operating' reactor during refueling/maintenance? Tech Spec LCO's are not applicable when no fuel is in the reactor.

New plant construction is not a 10 CFR 50.59 change to an operating facility is it? The NRC has never changed the definition of facility to cover this has it?

RECEIVED

MAR 18 AM 8:55

RULES AND DIRECTIVES

*SUNSI Review Complete  
Template = ADM-013*

*FRIDS = ADM-03  
Add = W. Minton (wfb)*