



NUCLEAR ENERGY INSTITUTE

Andrew N. Mauer
SENIOR PROJECT MANAGER
FUEL & MATERIALS SAFETY
NUCLEAR GENERATION DIVISION

3/01/2011

76 FR 11288

April 26, 2011

①

RECEIVED

2011 APR 26 PM 5:34

RULES AND DIRECTIVES
BRANCH

Ms. Cindy K. Bladey
Chief, Rules, Announcements and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry Comments on Draft Regulatory Guide, DG-7008, "Leakage Tests On Packages For Shipment of Radioactive Materials," Docket ID NRC-2011-0045

Project Number: 689

Dear Ms. Bladey:

On behalf of the nuclear industry, the Nuclear Energy Institute (NEI)¹ appreciates the opportunity to provide comments on draft regulatory guide DG-7008, "Leakage Tests On Packages For Shipment of Radioactive Materials," which was published in the *Federal Register* on March 1, 2011 (76 FR 11288). DG-7008 describes an approach that the NRC staff considers acceptable for meeting the containment criteria for Type B packages in Title 10, Section 71.51, "Additional Requirements for Type B Packages," of the *Code of Federal Regulations* (10 CFR 71.51). Industry believes that the proposed revision to this Regulatory Guide is an improvement from Regulatory Guide 7.4 (published in June 1975) and better reflects updated consensus standards. The proposed revision endorses the methods and procedures developed by the Standards Committee on Packaging and Transportation of Radioactive and Nonnuclear Hazardous Materials, N14, Subcommittee of the American National Standards Institute (ANSI) in ANSI N14.5-1997. However, this standard is in the process of being superseded by ANSI N14.5-2009, which we understand will be issued within the next few months. Industry believes the most efficient approach would be to endorse ANSI N14.5-2009 once it is available, rather than issue a new Regulatory Guide endorsing the 1997 version of the standard.

¹NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, nuclear material licensees, and other organizations and individuals involved in the nuclear energy industry.

SUNSI Review Complete

F-RIDS = ADM-03
Add = B. White (bhw)

m. Cole (mjc)
m. Orr (mfo)

template = ADM-013

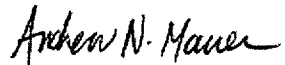
Ms. Cindy K. Bladey

April 26, 2011

Page 2

Thank you for the opportunity to comment on the document, and we look forward to reviewing the final version. If you have any questions concerning these comments, please contact me at 202-739-8018; anm@nei.org.

Sincerely,

A handwritten signature in black ink that reads "Andrew N. Mauer". The signature is written in a cursive style with a prominent initial "A".

Andrew N. Mauer

c: Mr. Bernard H. White, IV, NMSS/DSFST, NRC