

NRCREP Resource

From: Ron Lippy [rcl@tnorthconsulting.com]
Sent: Thursday, September 06, 2012 1:16 PM
To: NRCREP Resource
Subject: Response from "Comment on NRC Documents"

2012 SEP -6 PM 1: 57

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

RECEIVED

Ron Lippy (rcl@tnorthconsulting.com) on Thursday, September 06, 2012 at 13:16:05

Document_Title: RIS 2012-xxx NRC REGULATORY ISSUE SUMMARY 2012-XX CLARIFICATION OF SUBMISSION OF REQUESTS FOR RELIEF OR ALTERNATIVES UNDER 10 CFR 50.55a

Comments: On Page 7 of 9, under Timing of Relief Requests...,3rd paragraph of the DRAFT RIS: A statement is made that "Requests for relief under 10 CFR 50.55a(f)(5)(iii) related to IST are not subject to the restriction for submittals ..." 10 CFR 50.55a...clearly states for 10 CFR 50.55a(f)... for impracticality of meeting the OM Code requirements for testing, (similar to the statement regarding the 10 CFR 50.55a(g) for ISI), that the relief request must be submitted for NRC review and approval not later than 12 months after the expiration of the initial 120-month interval of operation...etc."
Based on my reading of the latest Code of Federal Regulations, Part 50, SubPart 55a..(f) (5)the relief request is required to be submitted to the NRC 12 months after the initial "impracticality" and every interval thereafter, similar to the "50.55a..(g) for ISI.

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*SOWSI Review Complete
Template = ADM-013*

*E-RIDS = ADM-03
Case = OT. Alexion (TWA)*