

# PUBLIC SUBMISSION

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**Docket:** NRC-2008-0198

Revisions to Transportation Safety Requirements and Harmonization with International Atomic Energy Agency  
Transportation Requirements

**Comment On:** NRC-2008-0198-0002

Revisions to Transportation Safety Requirements and Harmonization with International Atomic Energy Agency  
Transportation Requirements

**Document:** NRC-2008-0198-DRAFT-0002

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## Submitter Information

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**Organization:** Trojan ISFSI Licensee

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## General Comment

1. We agree with the proposed addition of 10 CFR 71.106 that will allow Part 71 QA Program changes that do not reduce commitments made to the NRC, to be implemented without obtaining Part 71 NRC approval.
2. We agree with the proposed change that will delete the QA Program approval expiration date and the Part 71.106(b) change that will require submitting QA Program changes that do not reduce commitments to the NRC every 24 months.
3. The Trojan ISFSI has a Part 71 (User) and Part 72 QA Program that has been approved by both NRC Part 71 and Part 72 departments. This rule change would allow us to make a change to our QA Program that does not reduce commitments for Part 71 and these could be implemented, however, without corresponding changes to 10 CFR 72 Subpart G, we will still be required to get Part 72 prior NRC approval for every change to our QA Program.  
Recommendation: We recommend and encourage the NRC to initiate action to make similar and compatible changes to 10 CFR 72 Subpart G, so that all changes that do not reduce commitments could be implemented without prior NRC approval.