

Regulatory Guide Periodic Review

Regulatory Guide Number: **3.52**

Title: **Standard Format and Content for the Health and Safety Sections of License Renewal Applications for Uranium Processing and Fuel Fabrication**

Office/division/branch: **NMSS/DFCSS/CDEB**

Technical Lead: **Breeda Reilly**

Recommended Staff Action: **Revise**

1. What are the known technical or regulatory issues with the current version of the Regulatory Guide (RG)?

References have been updated since the last publication of the RG 3.52. One of the references that was revised is NUREG 1520, Revision 1, "Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility," which was revised in May 2010. The revision provided increased clarity and definitions and added guidance in areas where information was previously lacking. However, the changes did not involve any new staff positions. Instead, existing guidance was consolidated to ensure the quality and uniformity of staff safety reviews. The NUREG was also reformatted and reorganized to improve consistency within the document.

Although the reference to the 2002 version of NUREG 1520 in RG 3.52 is outdated and may cause confusion, the public and licensees have been notified of the availability of the 2010 version of NUREG-1520 and can find it on the NRC website.

2. What is the impact on internal and external stakeholders of not updating the RG for the known issues, in terms of anticipated numbers of licensing and inspection activities over the next several years?

The number of renewal applications under 10 CFR Part 70, Domestic Licensing of Special Nuclear Material, is anticipated to be less than 5 over the next 3-5 years. The magnitude of the issue's impact on internal and external stakeholders is low to moderate.

3. What is an estimate of the level of effort needed to address identified issues in terms of full-time equivalent (FTE) and contractor resources?

An estimate of the effort needed to correct the identified issues is less than 0.1 FTE.

- 4. Based on the answers to the questions above, what is the staff action for this guide (Reviewed with no issues identified, Reviewed with issues identified for future consideration, Revise, or Withdraw)?**

The staff plans to revise RG 3.52 and anticipates that the changes to be an administrative (not technical). RG 3.52 is a pointer which directs the reader to the type of information acceptable to the NRC in its evaluation and verification of the safety basis for the licensing of special nuclear material (SNM). It references NUREG-1520, "Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility" issued March 2002.

- 5. Provide a conceptual plan and timeframe to address the issues identified during the review.**

NMSS/DFCSS/CDEB will provide a draft revision to Regulatory Guidance and Generic Issues Branch in the Office of Nuclear Regulatory Research in the near future. The revision is anticipated to be issued for either public comment or as a direct final guide within about 3 months after that.

NOTE: This review was conducted in April, 2014 and reflects the staff's plans as of that date. These plans are tentative and subject to change.