

RulemakingComments Resource

From: Bohm, Jacqueline L. <bohmj@missouri.edu>
Sent: Thursday, October 16, 2014 5:17 PM
To: RulemakingComments Resource
Subject: Docket ID NRC-2014-0118
Attachments: DocketID NRC-2014-0118.pdf

Good afternoon,

Attached are MURR's comments in regard to Docket ID NRC-2014-0118.

Thank you,

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RESEARCH REACTOR CENTER

October 16, 2014

Ms. Annette L. Vietti-Cook
Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

ATTENTION: Rulemakings and Adjudications Staff

SUBJECT: Request for Public Comment on “Rulemaking for Enhanced Security at Fuel Cycle Facilities; Special Nuclear Material Transportations; Security Force Fatigue at Nuclear Facilities” Docket ID NRC-2014-0118

The University of Missouri Research Reactor (MURR) appreciates the opportunity to provide comments on the potential changes the U.S. Nuclear Regulatory Commission’s (NRC) security regulations pertaining to the security at Research Reactors and entitled “Rulemaking for Enhanced Security at Fuel Cycle Facilities; Special Nuclear Material Transportations; Security Force Fatigue at Nuclear Facilities.”

- We feel it is very important to ensure that the proposed regulation makes it clear to which category a facility falls within. While the inclusion of a table that compares each category by assessing risk-informed insights which adjusts protective measures by applying the concept of SNM attraction due to dilution is an excellent idea, it is also imperative that each facility understands which security measures to which it must comply.
- We cannot meet the requirements listed in Category I without severely impacting Operations and believe Category II, based on the high radiation dose rate of the fuel, would be more appropriate. However, the use of a radiation dose rate on a single fuel element to keep the classification of the facility in Category II could put undue pressure on fuel management and spent fuel shipping. We suggest that a dose rate based on the environment near the fuel be used instead.
- The definitions of “special nuclear material,” “dilution,” and “weight percent” should be consistent with other regulations.
- The definitions of “spent fuel,” “irradiated fuel” and “fuel in cycle” need to be specifically delineated.
- There are inconsistencies between Part 37 requirements and the proposed Part 73 requirements in regard to the use of sealed PuBe neutron sources.



- As we understand the proposed rulemaking, MURR would fall within the Category II moderately dilute SNM group. As such, we have concentrated on Attachment 7 and offer the following specific comments:
 - Page G-1, Security Plans: It states that the Licensee must develop a management system which will develop, implement, revise and oversee security procedures that implement the physical protection requirements and security plans. Additional information in regard to the breakdown of the management system would be helpful. Does this system need to be a document or just an understood process?
 - Page G-2, Security Organization: It should be made clear what elements comprise the security organization. In the case of a university research reactor, the security organization consists of the licensed operators and university police department, with most likely, letters of agreement with other Local Law Enforcement Agencies. It should be understood that the one member (at least) who is required to be onsite and available all times to direct security activities, is to be a licensed operator and not a security guard.
 - Page G-2, Physical Barriers / Controlled Access Areas: Since the new rule may eliminate the definition of “self-protecting,” facilities that store actively cycled fuel and/or spent fuel that is being held for decay will require the storage pool or location to be within a controlled access area with a perimeter protected by a physical barrier designed and constructed to limit access into the controlled access area and channel personnel to designated access portals. This may be difficult to establish. We do not want the controlled access areas to reduce or even eliminate tours, both of which are an integral part of our mission.
 - Page G-5, Detection and Assessment Systems / Alarm Stations: Central alarm stations need to be in an area where the walls, doors, ceiling, floor and windows are bullet resistant. We are not sure that any university research reactor can meet this requirement. Another potential issue is the requirement to have alarm stations continuously staffed with at least one trained and qualified alarm station operator, who should not be assigned other duties or responsibilities which would interfere with the ability to execute the functions of the alarm station. The licensed operator on shift not only acts as the individual assigned the security function, but is also the individual operating the reactor; therefore, this individual does, in fact, have multiple duties and functions. University research reactors do not have the resources to dedicate a single person to monitor the alarm station and have that be his sole responsibility.
 - Page G-8, Security Program Review: It needs to be clearly understood what constitutes a security exercise. Does a tabletop exercise satisfy the intent or does this necessitate a drill with offsite responders? Also, does the 2-year physical security program review by an individual independent to the security program need to be a security specialist? Can it be by another group at the facility or a peer review by another university research reactor?

- Page G-9, Maintenance and Testing: We feel testing of the communication systems between alarm stations and local law enforcement agencies, including backup communications, need to be done only once every seven (7) days instead of daily.

Thank you for the opportunity to comment. Should you have any questions, please feel free to contact me at ButlerRa@missouri.edu or by calling (573) 882-4211. You may also contact John Fruits at FruitsJ@missouri.edu or by calling (573) 882-5319.

Sincerely,



Ralph A. Butler, P.E.
Director