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babcock & wilcox nuclear operations group

▶ p.o. box 785 ▶ lynchburg, va 24505-0785 usa ▶ phone 434.522.6000
▶ www.babcock.com

October 15, 2014
14-111

Secretary
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555-0001
ATTN: Rulemakings and Adjudications Staff

Reference: Regulatory Basis Document, "Rulemaking for Enhanced Security at Fuel Cycle Facilities; Special Nuclear Material Transportation; Security Force Fatigue at Nuclear Facilities," NRC Docket ID: NRC-2014-0118.

Subject: Special Nuclear Material Transportation and Category I -Moderately Dilute: Fixed Site Physical Protection Requirements - Regulatory Basis Document, "Rulemaking for Enhanced Security at Fuel Cycle Facilities; Special Nuclear Material Transportation; Security Force Fatigue Transportation; Security Force Fatigue at Nuclear Facilities," NRC Docket ID: NRC-2014-0118.

Dear Sir or Madam:

Babcock & Wilcox Nuclear Operations Group, Inc., Lynchburg (B&W NOG-L) appreciates the opportunity to provide comments in regards to the rulemaking efforts to 10 CFR Part 73, Regulatory Basis Document, "Rulemaking for Enhanced Security at Fuel Cycle Facilities; Special Nuclear Material Transportation; Security Force Fatigue at Nuclear Facilities," NRC Docket ID: NRC 2014-0118 released for public comments on June 18, 2014 by the U.S. Nuclear Regulatory Commission (NRC). B&W NOG-L also appreciates the NRC's extension to the comment period as granted in the Federal Register on June 18, 2014 (79 FR 34641), and for hosting the additional public meeting held on September 24, 2014.

B&W NOG-L's comments to the Regulatory Basis concerning transportation can be found in Enclosure 1. Comments concerning Category I -Moderately Dilute: Fixed Site Physical Protection Requirements can be found in Enclosure 2. Comments concerning Category 1: Fixed Site Physical Protection Requirements were provided to the NRC at a Closed Meeting on October 7, 2014.

As always, B&W NOG-L appreciates the opportunity the NRC provides for licensees to comment on preliminary language, and we hope that you will consider the recommendations/comments found in Enclosure 1. NOG-L would like to make additional comments on the rule making process after the NRC provides clarity to the questions/comments raised. This will allow NOG-L to fully understand the intent of the NRC and to have a basis of knowledge to make more thoughtful comments. Should additional information be needed for this matter, please contact me at 434-522-6405.

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Sincerely,

Kenneth Kieckhefer for CA England

Charles A. England
Manager, Licensing and Safety Analysis
Babcock & Wilcox Nuclear Operations Group, Inc., Lynchburg

Enclosure

cc: NRC, Region II
NRC, Resident Inspector
NRC, Merritt Baker
NRC, Thomas Pham