

NRC Response to Public Comments Received in Response to the Opportunity for Public Comment on the Information Collection and Reporting Burden for NRC Generic Letter 2016-XX, “Monitoring of Neutron-Absorbing Materials in Spent Fuel Pools”

I. Introduction

On June 4, 2015, the U.S. Nuclear Regulatory Commission (NRC) published a notice in the *Federal Register* (80 FR 31930) of an opportunity to provide comments on the information collection and reporting burden associated with a proposed generic letter 2015-XXXX on monitoring of neutron-absorbing material in spent fuel pools. Comments were received from the following individuals or groups:

| Letter No. | ADAMS No. | Commenter Affiliation | Commenter Name | Abbreviation |
|-------------------|------------------|-------------------------------|-----------------------|---------------------|
| 1 | ML16026A315 | Union of Concerned Scientists | David Lochbaum | UCS |
| 2 | ML16026A346 | South Carolina Electric & Gas | Damon Bryson | SCEG |

These comments are available electronically at the NRC's electronic Reading Room at <http://www.nrc.gov/reading-rm/adams.html>. From this page, the public can gain entry into the Agencywide Documents Access and Management System (ADAMS), which provides text and image files of NRC's public documents.

This document presents the NRC's responses to these comments. The NRC has either repeated comments as written by the commenter or summarized the comments for conciseness and clarity. At the end of the comment or comment summary, the NRC references the specific public comments and the letters by which they were provided to the NRC. Specific comments are referred to in the form [XXX]-[YYY], where [XXX] represents the commenter abbreviation from the table on page 1 of this document, and [YYY] represents the sequential comment number from that commenter. For the purpose of this document, sequential comments may be bullet points, summaries of a point, or comments designated as such by the commenter.

II. NRC Response to Comments

Comment: Instead of issuing this generic letter, the NRC should re-assess the safety benefits of storing fuel in dry storage instead of spent fuel pools. [UCS-1]

NRC Response: This comment is not within the scope of the comment. The comment does not address the information collection and reporting burden associated with this generic letter. No change was made to the generic letter or the information collection and reporting documentation for this generic letter as a result of this comment.

Comment: The responses to the generic letter will not provide a significant safety benefit commensurate with the burden being imposed on licensees, and the generic letter greatly underestimates the number of man-hours required to respond. [SCEG-1]

NRC Response: The NRC disagrees with this comment. This comment is an abbreviated version of comments submitted by the same commenter in response to the earlier public

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comment opportunity on the proposed generic letter itself (80 FR 31930; June 4, 2015). These concerns were addressed in the public comment response document (ADAMS Accession No. ML15222A005) associated with the prior opportunity for public comment (79 FR 13685; March 11, 2014). No new information on the information collection and reporting was presented in this comment, as compared with the comments submitted earlier by the same commenter in response to the March 2014 comment opportunity on the draft generic letter. The NRC considered and addressed these concerns in the public comment response document (ADAMS Accession No. ML15222A005) for the March 2014 comment opportunity. No change was made to the generic letter as a result of this comment.

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ADAMS Accession No.: ML16033A002

***via e-mail**

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| OFFICE | NRR/DSS/PM | NRR/DPR/PM | NRR/DPR/LA | OGC |
| NAME | SKrepel | SSanders* | ELee* | GMizuno* |
| DATE | 2/2/2016 | 2/2/2016 | 2/11/2016 | 2/5/2016 |

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