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Submitter Information

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RULES AND REGULATIONS

General Comment

See attached file(s)

Attachments

UMLRR comments draft 1537

11/16/2015
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Add= *D. Hardisty (dab 7)*



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RADIATION LABORATORY

February 1, 2016

U.S. Nuclear Regulatory Commission
Washington, DC 20555-001

SUBJECT: University of Massachusetts Lowell Research Reactor Comments Regarding Draft ISG NUREG 1537 Docket ID NRC-2012-0167

The University of Massachusetts Lowell Research Reactor (UMLRR) hereby submits the following comments on the draft Interim Staff Guidance (ISG) for NUREG 1537 which updates Chapter 7 regarding instrumentation and control license applications/amendments for Non-Power Utilization Facilities (NPUF).

The UMLRR endorses and agrees with the comments on the above subject as submitted by:

Mr. Mark A. Trump of the Penn State Breazeale Nuclear Reactor,
Dr. Thomas H. Newton Jr. of the NIST Center for Neutron Research,
Mr. Daniel J. Cronin.

In addition, the UMLRR submits that the Draft ISG NUREG 1537, by incorporation, adopts power reactor instrumentation and control (I&C) guidance to NPUF. The NRC Research and Test Reactor branch staff does not include experts in I&C (electrical or electronics engineers) who are also knowledgeable of research reactor design and the minimal risk associated with research reactor operation. Subsequently, the reliance on power reactor expertise and guidance documents in the development of Draft ISG NUREG 1537 is antithetical to the limitations of AEA 104.c in rule, policy, and process. The result will be an increase in burdensome regulatory requirements with no commensurate increase in public safety. The consequence will be the inability of the small staff at most research reactors to implement the new guidance. Many research reactors will be forced to either forgo I&C upgrades or submit a license amendment request that in itself will require the use of the guidance by the inevitable requests for additional information that will rely on the guidance. Ultimately, this will lead to the extended shutdown or the permanent shutdown and decommissioning of many research reactors.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Leo M. Bobek'.

Leo M. Bobek
University of Massachusetts Lowell Research Reactor