

June 29, 2016

MEMORANDUM TO: Edwin M. Hackett, Chairman  
Committee to Review Generic Requirements

FROM: Brian E. Holian, Director */RA/*  
Office of Nuclear Security and Incident Response

SUBJECT: RESPONSE TO REQUEST FOR INPUT REGARDING VALUE  
ADDED TO STAFF PROPOSALS AS A RESULT OF REVIEW BY  
THE COMMITTEE TO REVIEW GENERIC REQUIREMENTS

As requested by memorandum, "Request for Input Regarding Value Added to Staff Proposals as a Result of Review by the Committee to Review Generic Requirements (June 2015 Through May 2016)," dated June 8, 2016, the Office of Nuclear Security and Incident Response (NSIR) is providing comments regarding value added by the Committee to Review Generic Requirements (CRGR) on one Regulatory Issue Summary (RIS) issued by NSIR. Specifically, NSIR is providing comments on value added for RIS 2015-15, "Information Regarding Specific Exemptions in the Requirements for the Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material." The responses to four specific requests by CRGR are provided in the enclosure to this memorandum.

Enclosure:  
Comments regarding the CRGR review  
of RIS 2015-15

CONTACT: Duane White, NSIR/DSP  
301-287-3627

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|--------|---------------|-------------|-----------|
| OFFICE | NSIR/DSP/MWSB | NSIR/DSP    | NSIR/DPR  |
| NAME   | T. Mossman    | M. Galloway | B. Holian |
| DATE   | 6/27/16       | 6/29/16     | 6/29/16   |

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Comments regarding the Committee to Review Generic Requirements (CRGR) Review of RIS 2015-15, "Information Regarding a Specific Exemption in the Requirements for the Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material":

Request: Assess the overall value added by the CRGR (e.g., improvement in quality of product as it relates to underlying safety concerns, and backfit considerations, completeness, and consistency w/Commission policies, rules, and regs).

Response: CRGR had one comment regarding RIS 2015-15. The comment asked that NSIR confirm that it had the regulatory authority to include certain language in the RIS. The Office of the General Counsel (OGC) responded to the CRGR member's question, and the commenter was satisfied with OGC's response.

NSIR concluded that the comment was helpful, as it ensured the agency had the proper basis for the information provided in the RIS.

Request: Quantify effort expended by staff to address CRGR comments and recommendations (excluding time for re-concurrence by OGC and program offices).

Response: NSIR estimates that the time expended by the staff to address the comment was about 1 hour.

Request: Describe any adverse impact on your schedule as result of CRGR review.

Response: There was no adverse impact to the schedule for issuing the RIS as a result of the CRGR review.

Request: Assess significance of issues identified by CRGR as well as associated costs in terms of overall impact on schedules and resources.

Response: No significant issue was found by CRGR, and the comment provided by CRGR helped ensure the adequacy of the RIS. The CRGR review did not impact NSIR's schedule or resources.

Enclosure