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Revisions to Transportation Safety Requirements and Compatibility with International Atomic Energy Agency Transportation Requirements

Comment On: NRC-2016-0179-0005

Revisions to Transportation Safety Requirements and Compatibility with International Atomic Energy Agency Transportation Standards; Notice of Issues Paper, Public Meeting, and Request for Comment

Document: NRC-2016-0179-DRAFT-0013

Comment on FR Doc # 2016-27944

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General Comment

Secretary, U.S. Nuclear Regulatory Commission December 22, 2016

Washington, DC 20555-0001

ATTN: Rulemakings and Adjudications Staff

RE: Proposed revision of 10 CFR 71

Dear Regulator,

In Issue No. 4, Solar Insolation of the Issues Paper related to this rulemaking, the NRC proposes to adopt the same treatment of solar insolation that is found in IAEA SSR-6. Specifically, it is proposed to change the insolation units to match paragraph 657 of SSR-6, and to adopt a requirement to include solar insolation as an initial condition for the HAC fire event. This does not seem to us to present any hardship, since the unit change amounts to an increased solar heat input of only 3%, and since the inclusion of insolation as an initial condition for the fire event has been a requirement of the NRC staff for some time.

However, if the proposal is carried out as stated, there will still remain a discrepancy between 10 CFR 71.71

(c) and SSR-6 paragraph 657. This is the apportionment of insolation magnitude to various surface orientations and shapes. The difference is not gross, but nonetheless does exist. In other words, the insolation table of values found in 10 CFR 71.71(c) does not exactly match those of Table 12 of SSR 6. It would seem that the rationale used to support the changes stated in the Issues Paper would apply to the actual magnitudes of insolation as well. We suggest simply adopting Table 12 of SSR 6, as-is. Then you could truly say, that insolation is treated identically in both regulations. In addition, we suspect you will not find a significant effect on the safety or severity of the requirement.

Thank you for the opportunity to comment.

Yours Truly,
Philip W. Noss
Licensing Manager
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