

Duran-Hernandez, Doris

Subject: FW: Comments on Docket ID NRC-2016-0255
Attachments: 5014822-Comments on RIS for Corrections Revisions.pdf

From: Kimberly Manzione [mailto:K.Manzione@holtec.com]
Sent: Monday, March 20, 2017 4:17 PM
To: Bladey, Cindy <Cindy.Bladey@nrc.gov>
Cc: Goshen, John <John.Goshen@nrc.gov>; McKirgan, John <John.McKirgan@nrc.gov>; Layton, Michael <Michael.Layton@nrc.gov>; Kris Cummings (NEI) <kwcc@nei.org>
Subject: [External_Sender] Comments on Docket ID NRC-2016-0255

Ms., Bladey,

Please see attached comments on Docket Number NRC-2016-0255.

Thanks,

Kimberly Manzione
Licensing Manager
Holtec International
Office: 856-797-0900 ext 3951
Cell: 609-781-2629

RECEIVED

2017
21 MAR 20 PM 5:20

REC'D - 2017

1/18/2017

82 FR. 5445

①

SUNSI Review Complete
Template = ADM - 013
E-RIDS= ADM-03
Add= J. Goshen (JLE9)
B. White (BHW)



March 20, 2017

Ms. Cindy Bladey
Office of Administration
Mail Stop: OWFN-12-H08

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: Holtec International Comments on NRC Regulatory Issue Summary 2016-XX
Administration of 10 CFR Part 72 Certificate of Compliance Corrections and
Revisions

Reference: [1] NRC-2016-0255, Draft "NRC Regulatory Issue Summary 2016-XX
Administration of 10 CFR Part 72 Certificate of Compliance Corrections and
Revisions," dated December 20, 2016

Dear Ms. Bladey:

Holtec International appreciates the opportunity to comment on the NRC's draft Regulatory Issue Summary on 10CFR72 Certificates of Compliance (CoC) Corrections and Revisions [1]. Holtec has been involved in previous applications on both corrections and revisions, and we appreciate the staff's RIS to clarify the process.

Holtec has the following suggestions to further improve the information in the RIS.

1. The RIS section on the "Corrections" process describes the types of errors that can be fixed under the process. To help provide guidance on the typographical or editorial errors that can be fixed by a correction, Holtec suggests that this section include a statement that these corrections include changes that do not require a change to the NRC's SER. This type of statement would help clarify what changes can be submitted as corrections as opposed to those that should be revisions or amendments.
2. The RIS section on the "Revisions" process indicates that in some prior instances the NRC has provided an implementation period for users of the amendment. Holtec believes that this implementation period is essential to the revision process and should be implemented in all cases. The implementation period should be a minimum of 180 days.

Additionally, the description of the "Revision" process also includes a discussion of the NRC staff acceptance of documentation from general licensees indicating that they will voluntarily



Holtec Technology Campus, 1 Holtec Blvd., Camden, NJ 08104

Telephone (856) 797-0900

Fax (856) 797-0909

comply with the revised CoC. Holtec understands that there are backfit concerns which are alleviated by the voluntary acceptance from general licensees. However, it does take substantial effort for the general licensees to issue letters that they will voluntarily accept the revisions. This difficulty will likely limit the number of applications for revisions submitted by CoC holders.

If you have any questions please contact me at 856-797-0900 ext 3951.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kim Manzione".

Kimberly Manzione
Licensing Manager,
Holtec International

cc: (via email)
Mr. John Goshen, USNRC
Mr. John McKirgan, USNRC
Mr. Michael Layton, USNRC
Mr. Kris Cummings, NEI