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# PUBLIC SUBMISSION

**Docket:** NRC-2011-0087  
Non-power Production or Utilization Facility License Renewal

**Comment On:** NRC-2011-0087-0023  
Non-Power Production or Utilization Facility License Renewal

**Document:** NRC-2011-0087-DRAFT-0026  
Comment on FR Doc # 2017-06162

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## Submitter Information

**Name:** Cameron Goodwin

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## General Comment

Please see attached comments.

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## Attachments

comments on NPUF rulemaking



**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS**

Rhode Island Atomic Energy Commission

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May 25, 2017

Docket No. 50-193

License No. R-95

U.S. Nuclear Regulatory Commission

Attn: Document Control Desk

Washington, D.C. 20555-0001

Subject: Comments from Rhode Island Nuclear Science Center on NPUF Rulemaking

As a facility affected by this rule making, we are generally supportive of this effort. We do have a few comments on the proposed rule. Does the five year review of the FSAR just deal with changes that have been made to the FSAR over the five year period? Our concern is that these reviews will most likely go out to contractors who are working on time and labor. If the review is not limited to just the changes that have occurred, then it leaves the facilities open to a flood of requests for additional information due to the fact that the reviewers might not be familiar with all parts of the facilities. This would lead to additional burden on the licensees that would far exceed what is currently required.

We do feel that sending out the initial FSAR submission dates via individual orders seems to be the best method to start the process. This will eliminate the potential problem of all of the facilities submitting their updates at the same time and overloading the NRC staff. We are also supportive of the accident dose criterion establishment of 1 Rem.

If there are any questions regarding this matter, please feel free to contact me at (401) 874-2600.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cameron Goodwin".

Cameron Goodwin, PhD, Director  
Rhode Island Nuclear Science Center