

As of: 6/9/17 11:33 AM Received: June 08, 2017 Status: Pending_Post Tracking No. 1k1-8wuc-82qi Comments Due: June 13, 2017 Submission Type: Web
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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-0031
Comment on FR Doc # 2017-06162

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General Comment

The NRC proposes to require initial FSAR updates within 1 year (Group 1 licensees) or 2 years (Group 2 licensees). As noted in the proposed rulemaking, many research and test reactors are university facilities with minimal staffing. Furthermore, comprehensive FSAR updates within the next several years represent an additional, significant near-term burden that was not anticipated at these facilities, since under the existing regulations most facilities have more than a decade left prior to the expiration of their licenses. In order to reduce this burden and to enable the facilities to submit high-quality updated FSARs, the deadline for submitting updated FSARs should be extended to 3 years for Group 1 licensees and 5 years for Group 2 licensees.