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Non-power Production or Utilization Facility License Renewal

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Non-Power Production or Utilization Facility License Renewal

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General Comment

The intent and overall effect of the proposed rulemaking is to reduce the licensing burden on most NPUF licensees by eliminating license expirations. However, many NPUF licenses are not set to expire for almost 20 years, and the requirement to submit revised FSARs within 1 or 2 years imposes a significant initial burden. The proposed rulemaking notes that "Should the NRC identify potential safety issues with the facility's continued safe operation in its reviews of FSAR updates, the Commission can undertake regulatory actions specified in 2.202 to modify, suspend, or revoke a license." This can lead to an interpretation that the licensee must take care to provide an updated FSAR with the same level of quality as would be issued with a license amendment application or risk having their license suspended. In other words, the required FSAR update could serve as a de facto round of license renewal many years in advance of a license expiration date. In order to ensure that the FSAR update does not impose a severe burden on the licensee, the NRC should provide a written commitment to accept calculations and methods of calculation that were used in the original analysis and have not been affected by changes to the facility since the most recent license was issued.