

<b>As of:</b> 6/13/17 9:55 AM <b>Received:</b> June 12, 2017 <b>Status:</b> Pending_Post <b>Tracking No.</b> 1k1-8wwz-pn6d <b>Comments Due:</b> June 13, 2017 <b>Submission Type:</b> 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-0034  
Comment on FR Doc # 2017-06162

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## Submitter Information

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**Submitter's Representative:** Cameron Goodwin  
**Organization:** TRTR

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## General Comment

TRTR community comments attached.

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## Attachments

TRTR NPUF Rule comments final



National Organization of Test,  
Research, and Training  
Reactors

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Bill Vernetson

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555-0001

Subject: Comments from TRTR on Non-Power Production or Utilization  
Facility License Renewal (NRC-2011-0087-0023)

The community as a whole has reviewed the NRC proposed rule and have submitted comments individually. We feel the following comments reflect concerns to the community as a whole.

Elimination of Licensing Terms for Research Reactor

In general, the community is in favor of the effort to reduce the regulatory burden on these facilities. However there are some concerns. One concern is the increase in burden it will place on test reactors, requiring them to complete both the 5 year FSAR reviews and the 20 year license renewals. There are also some reactors that feel the current method is more beneficial than the five-year reviews of the FSAR. Perhaps, the individual reactors could choose whether or not they would like to participate in the new method or stay with the current 20 year renewal, similar to whether new reactor applicants choose Part 50 or Part 52 of Title 10 the Code of Federal Regulations.

Definition of Testing Facility

The community is aware that a Petition for Rulemaking has been submitted by the NIST Center for Neutron Research (NCNR). We fully support this petition and believe that all regulations should reflect the risk that a facility poses.

FSAR Updates

It is important that the community maintains up-to-date FSARs and that the NRC review these documents periodically. On paper, the five year review is appropriate. However, the community does have some reservations as to how these reviews will be conducted. If the review is not limited to just the changes that have occurred since the previous review, 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.

Accident Dose Standard

As is stated in the regulatory basis document, there is a lack of accident dose standards for research reactors. The establishment of 1 Rem accident dose criterion is appropriate for the community.

Timely Renewal

While, we understand that the NRC may have a difficult time conducting an acceptance review of an application within 30 days, extending the time required for license renewal submission to 24 months is extreme. This would place additional burden on those facilities still undergoing license renewal.

Elimination of Financial Qualification Information

We concur with NRC's assessment that the submittal of financial qualification information for license renewal serves no benefit and elimination of this requirement will reduce the burden, both for the licensee and NRC.

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

Respectfully,



Cameron Goodwin, PhD  
Chair, TRTR