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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-0038  
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## Submitter Information

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## General Comment

Document NRC-2011-0087-0026, Environmental Assessment Supporting Proposed Rule: Streamlining the Non-power Production or Utilization Facility License Renewal Process, dated March 2017, has the wrong power level for the Kansas State University license in Table 1 on page 10. It is listed as 250 kW(t), but should be listed as 1,250 kW(t).

In Section II, Part C, Ongoing Oversight Activities, the Proposed Rule Document states that NPUFs operating under 2 MW are subject to inspection once every two years. The Kansas State University TRIGA Mark II Nuclear Reactor, which is licensed for power levels below 2 MW, has been inspected annually, at least for the past few years. Please clarify whether the Proposed Rule Document is changing the current rule on NPUF inspection to biennial for NPUFs operating under 2 MW.

Will other portions of 10 CFR, such as 10 CFR 50.54, be amended to clarify which requirements are applicable to NPUFs, power reactors, or all reactors?