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Non-Power Production or Utilization Facility License Renewal

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Submitter Information

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General Comment

See attachment.

Attachments

Comment01_by_Jenkins_on_NRC-2011-0087-0023

13 June 2017

Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

ATTN: Rulemaking and Adjudications Staff

Subject: Non-Power Reactor License Renewals

Ref: Docket NRC-2011-0087

I applaud the effort by the Non-Power Reactor Branch in the proposed rule regarding Non-Power Production or Utilization Facility License Renewal. I believe the intention of the rule, the reduction of the significant effort witnessed in the most recent round of Research and Test Reactor (RTR) license renewals, is a benefit to all stakeholders in the process. The development of a non-expiring license for the RTRs that do not fall into the Test Reactor category, with the requirement that Final Safety Analysis Reports (FSAR) be kept up to date and subject to a review by the NRC every five years is a very good compromise to ensure the continued safe operation of the reactors, and protection of the public health and the environment.

The new process, however, may prove to be a significant economic burden to the RTRs licensees that are non-university related, and are therefore required to pay the NRC an hourly rate for the agency's time in handling license actions related to these licensees. One could foresee such an economic burden forcing the closure of such a reactor (e.g., Dow Chemical's TRIGA reactor) due to the change from a somewhat predictable large expense every 20 years to a potentially less predictable large expense every five. The situation for the only NRC Test Facility is similar.

Therefore, a possible solution to this dilemma would be the creation of a "*cafeteria-style"* license selection, where the *status quo ante* could be maintained by those licensees that would choose it (the number would likely be few), and the rest of the RTR licensees (most or all of the university owned) could choose the non-expiring license term proposed in this rulemaking. This small change would allow the licensees to pick the best license solution for their needs and purposes.

I appreciate the opportunity to comment on the rulemaking. The NRC should always bear in mind that the majority of the RTR licensees have very small staffs, extremely limited budgets, and those staff members often teach classes and have other duties at

their institutions. Increased regulation, frequency of inspections, and other undue administrative burdens can have a serious impact, and may force the business entities or universities to see these facilities (that are very important to the education and training of the nation's nuclear workforce) as unsustainable expenses.

Sincerely,

Jere H. Jenkins
Former Chairman of the National Organization of Test, Research and Training Reactors
Former Senior Reactor Operator
Former Facility Director for PUR-1