

As of: 8/21/17 8:13 AM
Received: August 10, 2017
Status: Pending_Post
Tracking No. 1k1-8y0j-eyph
Comments Due: August 14, 2017
Submission Type: Web

PUBLIC SUBMISSION

Docket: NRC-2016-0269

OMB Renewal of Information Collections Contained in 10 CFR Part 72, Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste and Reactor-Related Greater than Class C Waste

Comment On: NRC-2016-0269-0003

Information Collection: Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater Than Class C Waste

Document: NRC-2016-0269-DRAFT-0003

Comment on FR Doc # 2017-12383

Submitter Information

Name: Anonymous Anonymous

General Comment

In response to your request for comments, specifically Item 4: "How can the burden of the information collection be minimized, including the use of automated collection techniques or other forms of information technology?", Portland General Electric Company (PGE) is submitting comments related to the requirement for NRC prior approval of any change to its NRC approved Part 71 and 72 Quality Assurance Program associated with the Trojan ISFSI Specific License, SNM 2509.

In June 2015, the NRC changed 10 CFR 71 by adding a new Part 71.106 that allows Part 72 specific licensees to make changes to their NRC approved quality assurance program that do not reduce commitments without prior NRC approval but does require licensees to submit these changes to the NRC every 24 months.

10 CFR 72 has not been changed and still requires NRC prior approval for all changes as reinforced by NRC Information Notice 2002-35, dated December 20, 2002 and titled "Changes to 10 CFR Parts 71 and 72 Quality Assurance Programs" that states in part: "Once a Part 71 and 72 QA program is approved, no changes to the program may be made without further NRC approval, because a change would alter the program and make it an unapproved program." It is noted that this is a partially outdated Information Notice now that 10 CFR 71.106 has been issued.

PGE recommends and encourages the NRC to initiate action to make changes to 10 CFR 72 Subpart G that are consistent with those in 10 CFR 71.106 such that an ISFSI specific licensee could make changes, that do not reduce commitments to their NRC approved Part 71 and Part 72 quality assurance program, and these

changes would not require prior NRC approval. This 10 CFR 72 change would reduce the burden on ISFSI specific licensees and the NRC for quality assurance program changes that do not reduce commitments in the quality assurance program previously approved by the NRC

In addition, if NRC completes this recommended change to 10 CFR 72, we recommend withdrawing NRC Information Notice 2002-35, or revising it to reflect the 2015 change to 10 CFR 71 and the consistent change to 10 CFR 72, related to NRC approval of quality assurance programs.