

Regulatory Guide Periodic Review

Regulatory Guide Number: 3.52, Revision 2

Title: Standard Format and Content for the Health & Safety Sections of License Renewal Applications for Uranium Processing and Fuel Fabrication

Office/Division/Branch: NMSS/FCSE/FMB
Technical Lead: Nick Baker

NRC Staff Action Decided: Reviewed with issues identified for future consideration

1. What are the known technical or regulatory issues with the current version of the Regulatory Guide (RG)?

This RG was issued in 2009 and provides guidance on the evaluation and verification of the safety basis for the licensing of special nuclear material (SNM) based on the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 70, "Domestic Licensing of Special Nuclear Material."

This RG endorses the methods and procedures for evaluation and verification of the licensing of SNM detailed in NUREG-1520, "Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility." However, NUREG-1520 (Standard Review Plan) has been updated twice since the last publication of RG 3.52.

As a result, the RG does not include the current methods and procedures for the evaluation and verification of SNM and clarification of the guidance contained in certain sections of the NUREG. This RG should be updated to include the latest guidance developed by the staff.

2. What is the impact on internal and external stakeholders of not updating the RG for the known issues, in terms of anticipated numbers of licensing and inspection activities over the next several years?

The U.S. Nuclear Regulatory Commission (NRC) staff does not expect any renewal application for major SNM licensees under 10 CFR Part 70 within the next 5 years. Therefore, there is no impact for the known issues on internal and external stakeholders.

3. What is an estimate of the level of effort needed to address identified issues in terms of full-time equivalent (FTE) and contractor resources?

An estimate of the effort needed to correct the identified issues is about 0.1 FTE.

4. Based on the answers to the questions above, what is the NRC staff action for this guide (Reviewed with no issues identified, Reviewed with issues identified for future consideration, Revise, or Withdraw)?

Reviewed with issues identified for future consideration.

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5. Provide a conceptual plan and timeframe to address the issues identified during the review.

There are no plans to update this RG in the near future since the identified issues have no impact on applicants and licensees.

NOTE: This review was conducted in May 2018 and reflects the NRC staff plans as of that date. These plans are tentative and are subject to change.