

From: [White, Bernard](#)
To: [Macdougall, Robert](#)
Subject: RE: REQUEST: Division-level review of the NAC International COC No. 1015, Amendment No. 6
Date: Thursday, September 20, 2018 12:24:11 PM

yes

Thanks
Bernie White
Senior Project Manager
Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards
(301) 415-6577

From: Macdougall, Robert
Sent: Thursday, September 20, 2018 12:23 PM
To: White, Bernard <Bernard.White@nrc.gov>
Subject: RE: REQUEST: Division-level review of the NAC International COC No. 1015, Amendment No. 6

Hi, Bernie,

Does your response below also signify that you've looked at Theresa's other revisions and are fine with them? Just checking.

Rob

From: White, Bernard
Sent: Thursday, September 20, 2018 10:27 AM
To: Clark, Theresa <Theresa.Clark@nrc.gov>
Cc: Holahan, Patricia <Patricia.Holahan@nrc.gov>; Bladey, Cindy <Cindy.Bladey@nrc.gov>; Layton, Michael <Michael.Layton@nrc.gov>; McKirgan, John <John.McKirgan@nrc.gov>; Morgan-Butler, Kimyata <Kimyata.Morgan-Butler@nrc.gov>; Macdougall, Robert <Robert.MacDougall@nrc.gov>
Subject: RE: REQUEST: Division-level review of the NAC International COC No. 1015, Amendment No. 6

Theresa,

I looked at your comment regarding preliminary/final SER. we use the term "preliminary SER" when we publish it for comment in the rulemaking, in case there is a comment that is significant and adverse and requires us to withdraw the rulemaking, and revise our SER.

If there are no significant and adverse comments, when we issue the certificate, the "preliminary SER" becomes a final SER. Other than dating the SER, this is the only change to the SER.

Thanks
Bernie White

Senior Project Manager
Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards
(301) 415-6577

From: Clark, Theresa

Sent: Thursday, September 20, 2018 10:18 AM

To: Macdougall, Robert <Robert.MacDougall@nrc.gov>; White, Bernard <Bernard.White@nrc.gov>

Cc: Holahan, Patricia <Patricia.Holahan@nrc.gov>; Bladey, Cindy <Cindy.Bladey@nrc.gov>; Layton, Michael <Michael.Layton@nrc.gov>; McKirgan, John <John.McKirgan@nrc.gov>; Morgan-Butler, Kimyata <Kimyata.Morgan-Butler@nrc.gov>

Subject: RE: REQUEST: Division-level review of the NAC International COC No. 1015, Amendment No. 6

That worked, yay. Thanks for the quick review and persistence in document transmittal. I support the changes you made with the following notes:

- In all places where you added the #5 (thanks) ensure that the semicolon goes outside the quotation mark
- “might” instead of “would” is fine on p. 12 (comment re: SFPs)
- Keep “tiering”/“tiers” since it’s just a preference

From: Macdougall, Robert

Sent: Wednesday, September 19, 2018 8:59 PM

To: Clark, Theresa <Theresa.Clark@nrc.gov>

Cc: Holahan, Patricia <Patricia.Holahan@nrc.gov>; Love Blair, Angella <Angella.LoveBlair@nrc.gov>; Bladey, Cindy <Cindy.Bladey@nrc.gov>; Layton, Michael <Michael.Layton@nrc.gov>; McKirgan, John <John.McKirgan@nrc.gov>; White, Bernard <Bernard.White@nrc.gov>; Morgan-Butler, Kimyata <Kimyata.Morgan-Butler@nrc.gov>

Subject: RE: REQUEST: Division-level review of the NAC International COC No. 1015, Amendment No. 6

Hi, Theresa,

I made all the changes to the transmittal and EDO signature memos you requested, including numbering all 5 of the Amendment’s revisions, but as you probably know by now, the OFR has a rule against numbering in FRN Summary sections, so there are no numbered Summaries in either of the FRNs for the proposed or direct final rules. Since you had a number of comments and questions on the DFR FRN, however, I thought you might want to review my responses, and give Bernie a chance to review them and correct me as well.. On your question about whether there can ever be a final SER, for example, I would bow to Bernie. Bernie may also be better able to assess how far we can stray from the approved template language without having to ask OGC for another review.

Thanks again for your quick turnaround,
Rob

From: Clark, Theresa
Sent: Wednesday, September 19, 2018 1:37 PM
To: Morgan-Butler, Kimyata <Kimyata.Morgan-Butler@nrc.gov>
Cc: Holahan, Patricia <Patricia.Holahan@nrc.gov>; Macdougall, Robert <Robert.MacDougall@nrc.gov>; Love Blair, Angella <Angella.LoveBlair@nrc.gov>; Bladey, Cindy <Cindy.Bladey@nrc.gov>; Layton, Michael <Michael.Layton@nrc.gov>; McKirgan, John <John.McKirgan@nrc.gov>; White, Bernard <Bernard.White@nrc.gov>
Subject: RE: REQUEST: Division-level review of the NAC International COC No. 1015, Amendment No. 6

Hi Kim! Thanks for sending this CoC package for my review. I have no significant comments and concur for DRM. Let me know if you need me to sign a hard-copy package.

Attached are markups of the main package documents with editorial/formatting suggestions for your consideration. Unless they go against previous agreements (e.g., with OGC), I recommend that you make the changes—most importantly consistent numbering of the 5 features of Amendment No. 6 and clearer statements of the action in the transmittal memo and perhaps memo to the Commission.

I do not have viewer rights to the supporting-document package but can review that later if you give me access.

Thanks!

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Theresa Valentine Clark

Deputy Director, Division of Rulemaking
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U.S. Nuclear Regulatory Commission
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From: Morgan-Butler, Kimyata
Sent: Tuesday, September 18, 2018 1:20 PM
To: Clark, Theresa <Theresa.Clark@nrc.gov>
Cc: Holahan, Patricia <Patricia.Holahan@nrc.gov>; Macdougall, Robert <Robert.MacDougall@nrc.gov>; Love Blair, Angella <Angella.LoveBlair@nrc.gov>; Bladey, Cindy <Cindy.Bladey@nrc.gov>; Layton, Michael <Michael.Layton@nrc.gov>; McKirgan, John <John.McKirgan@nrc.gov>; White, Bernard <Bernard.White@nrc.gov>
Subject: REQUEST: Division-level review of the NAC International COC No. 1015, Amendment No. 6

Hi Theresa,

The direct final rule and companion proposed rule package for the NAC International COC No. 1015, Amendment No. 6 is ready for your review. The link to the DFR ADAMs package is below. In addition, we've also included a link to a separate package with the accompanying Congressional letters for the DFR.

[View ADAMS Properties ML18211A693](#)

[Open ADAMS Package \(EDO Signature Package, NAC International, Certificate of Compliance No. 1015, Amendment No. 6\)](#)

[View ADAMS Properties ML18261A190](#)

[Open ADAMS Package \(Supporting Documents - EDO Signature Package, NAC International, Certificate of Compliance No. 1015, Amendment No. 6\)](#)

Per procedure, after your review and concurrence we'll forward to OEDO. Please let us know if you have any questions.

Thanks,

Kim

Kimyata Morgan-Butler, Chief
Materials Rulemaking and Project Management Branch
Division of Rulemaking
Office of Nuclear Material Safety and Safeguards
US Nuclear Regulatory Commission
301-415-0733