SUNSI Review Complete Template = ADM-013 E-RIDS=ADM-03 ADD: Mirabelle Shoemaker

PUBLIC SUBMISSION COMMENT (5)

COMMENT (5) PUBLICATION DATE: 8/16/2019 CITATION 84 FR 41644 **As of:** 11/5/19 10:57 AM

Received: November 05, 2019

Status: Pending Post

**Tracking No.** 1k3-9d50-2a4f

Comments Due: November 13, 2019

CITATION 84 FR 41644 Submission Type: API

**Docket:** NRC-2019-0108

Revision to NUREG/BR-0006 and NUREG/BR-0007

Comment On: NRC-2019-0108-0001

Revision to NUREG/BR-0006 and NUREG/BR-0007

**Document:** NRC-2019-0108-DRAFT-0005

Comment on FR Doc # 2019-17514

## **Submitter Information**

Name: Damon Bryson

**Address:** 

451 Old Ruff Rd

Winnsboro, SC, 29180 **Email:** dbryson@scana.com **Organization:** Dominion Energy

## **General Comment**

## Comments on BR-0006 Rev 9:

Section 2.1.1 Typo Entre

Page 9 item 23a if always left blank, why is there a question on the form?

Page 9 item 23b if always left blank, why is there a question on the form?

Page 9 item 23c if all UK shipments are reportable, why is there a question on the form?

Page 9 item 24 The gross weight of a shipment is irrelevant to SNM tracking. The amount of packaging does not matter.

Page 12 item 26g changing reporting units between categories can only add confusion to the form. Please standardize on a consistent unit. For consistency with IAEA, type 89 should be deleted.

Page 13 item 26l gross weight is irrelevant should not be tracked.

Page 13 item 26m is indented inconsistently.

Page A-1 line 17 typo on D-2 (should be D-25). Also, composition codes should be sorted to allow users to find them in the list more easily.

Page F-4 add a line return between Block 19 and Block 20 paragraphs.

Page G-8 material types should standardize on a consistent unit grams. Type 81 should be labeled as natural uranium, not normal uranium.

Page G-9 material types should standardize on a consistent unit grams.