



NIRMA

Nuclear Information and Records Management Association Inc.
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DOCKET NUMBER PR 50, 72, 170
PROPOSED RULE (54 FR 19379)

Karen L. Ledbetter, CRM
NIRMA, President OCT 16 P3:16

October 10, 1989

OFFICE OF THE SECRETARY
DOCKETING AND SERVICE BRANCH

Secretary
U.S. Nuclear Regulatory Commission
Attention: Docketing and Service Branch
Washington, D.C. 20555

Subject: RRS #89-15

Following review by members of the Regulations Review Subcommittee and consideration by the NIRMA Board of Directors, I submit the following comments to the subject document:

o Supporting Statement - 72.232 (c)

The proposed amendment raises the question of how the vendor's QA program assures that the casks are used in accordance with the applicable quality assurance measures.

Estimate of Burden

Probably minimal.

o Supporting Statement - 72.234 (d) (1) (3) and (f)

The proposed amendment requires the vendor to keep a record for the life of the cask. As such, a reporting mechanism would have to be developed and implemented from the user to the vendor.

Estimate of Burden

The record keeping burden could double.

Thank you for providing NIRMA the opportunity to respond to this document. We appreciate the opportunity to clarify and strengthen the regulations which govern our industry.

Karen L. Ledbetter, CRM
President, Nuclear Information
and Records Management
Association

Enclosure: Comments

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Date: 6 / 16 / 89

RRS # 89-15

NUCLEAR INFORMATION AND RECORDS MANAGEMENT ASSOCIATION
REGULATIONS REVIEW SUBCOMMITTEE
REVIEW SHEET

I. Title of Attachment: OMB Supporting Statement - Licensing Requirements for the Independent Storage of Spent Nuclear Fuel and High Level - Radioactive Waste.

II. Instructions: The sections of the attached proposed regulation listed in Part III have been identified for you as having potential impact on recordkeeping and information collection. Please follow these instructions when commenting on the proposed regulation.

1. Read the entire proposed regulation first.
2. Carefully reread each section itemized in Part III and prepare a comment.
3. If you agree with the itemized section of the proposal, write ACCEPTABLE.
4. If you disagree with the itemized section, write UNACCEPTABLE and state why in the comment space provided.
5. Write any additional comments in the space provided on the reverse side of this sheet.
6. Return your completed review to designated Subcommittee Member

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within 10 calendar days of receipt or by / / .

III. Comments:

1. Section 72.212, page(s) 2-4, paragraph(s) 7

Comment: Acceptable-No comment

2. Section 72.216, page(s) 4, paragraph(s) 2

Comment: Acceptable-No comment

3. Section 72.218, page(s) 4, paragraph(s) 1.

Comment: Acceptable-No comment

4. Section 72.230, page(s) 465, paragraph(s) 1.

Comment: Acceptable-No comment

5. Section 72.232, page(s) 5, paragraph(s) 1 (c).

Comment: Unacceptable- How can the Vendors QA program assure that the cask is used in accordance with the applicable quality assurance measures?

6. Section 72.234, page(s) 566, paragraph(s) 3 (d)(1,3),(f)

Comment: Unacceptable- (2nd paragraph) If the Vendor is required to keep a record for the life of the cask, then a reporting mechanism will be required from the user to the Vendor.

7. Section 72.236, page(s) 5, paragraph(s) 1.

Comment: Acceptable-No comment

8. Section 72.236, page(s) 6, paragraph(s) 1.

Comment: Acceptable-No comment

For Additional Comments (Use Next Page)