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Reg Guide

June 18, 1981

Secretary of the Commission
US Nuclear Regulatory Commission
Washington, DC 20555

Att: Docketing and Service Branch

Gentlemen:



We are pleased to provide the following comments on the draft Regulatory Guide, "Guidance on Preparing a License Application to Store Spent Fuel in an Independent Spent Fuel Storage Installation," dated March 1981 (Task FP907-4).

Page 6, last paragraph under Chapter 1, next to last sentence:

The phrase "throughout its operating life" is vague here because no applicant knows in advance exactly how long the operating life of the ISFSI will be; 10 CFR 72.32 (a) allows for a 20-year period plus renewals. Some clarification here of operating life to refer to this would be helpful. This comment also applies on Page 12, Chapter 14, first paragraph, second sentence, where the words "entire life of the proposed ISFSI" are used.

Page 9, Chapter 7, second paragraph, second sentence:

"Identified as being important to safety" is vague. A reference to a listing or description of function that would make items important to safety should be provided, as well as a definition of safety importance and ways of achieving it for an ISFSI.

Page 10, Chapter 9:

Storage of consolidated fuel rods from an assembly should also be considered. Therefore, special requirement in the area of inventory and record keeping for stored fuel pins should be described in this section.

We would also like to take this opportunity to make the related comment that the draft Regulatory Guide, "Design of an Independent Spent Fuel Storage Installation (Water Basin Type)," dated January 1981 (Task FP806-6) should be updated to refer to the final ANS-57.7 - 1981 Standard, as approved February 19, 1981 by ANSI.

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Comment.*

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Acknowledged by card. 6/23/81.mdv.

June 18, 1981

Thank you for the opportunity to provide comments on the Regulatory Guides. Please include Harold Rothstein on your mailing list for future revisions to these Regulatory Guides and associated documents related to ISFSI's or spent fuel storage.

Very truly yours,



HLR:iamT1

J C Saldarini
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cc: A Ugelow
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