



ARMED FORCES RADIOBIOLOGY RESEARCH INSTITUTE

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7 December 1995

SUBJECT: Draft Application Format and Content Guidance and Review Plan and
Acceptance Criteria for Non-Power Reactors

50-170

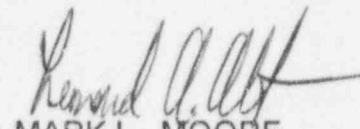
Director, Non-Power Reactors and Decommissioning Project Directorate
United States Nuclear Regulatory Commission
M. S. 11-B-20
Washington, DC 20555

Dear Director:

We have reviewed Chapter 11, "Radiation Protection Program and Waste Management" of the draft "Format and Content for Applications for the Licensing of Non-Power Reactors" and the draft "Standard Review Plan and Acceptance Criteria for Applications for the Licensing of Non-Power Reactors."

We find this draft generally clear and workable. We believe it represents an improved mechanism for the preparation, review, and ultimate approval of Safety Analysis Reports (SARs) and licensing applications for non-power reactors.

Specific comments and questions related to our review of this document are attached. Please contact Mark Moore, at telephone number (301) 295-5590, if you have any questions regarding these comments.

for 
MARK L. MOORE
Reactor Facility Director

Attachments:

(1) Comments on Chapter 11

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AFRRI COMMENTS

SAR REVIEW PLAN AND ACCEPTANCE CRITERIA

CHAPTER 11: RADIATION PROTECTION PROGRAM and WASTE MANAGEMENT

SECTION	REQUIREMENT	COMMENT	SUGGESTION
SF&C, p. 11-3, ¶ 11.1.1.	Identification of such wastes should indicate which are associated with the operation and with the utilization of the reactor.	The meaning of this section is unclear. Is the intent to distinguish between "wastes from operations" versus "wastes from utilization"?	Modify this section to more clearly state the requirement.
RP&AC, p. 11-19 to 20, ¶ 11.1.6.4.	The review included provisions for recordkeeping and historical information about occurrences of radioactive contamination at the facility was examined, which helps confirm that the program is effective.	The meaning of this section is unclear.	Modify this section to clarify.

NOTE: SF&C denotes comments pertaining to the SAR Standard Format and Content
RP&AC denotes comments pertaining to the SAR Review Plan and Acceptance Criteria