

Lappert, Glenna

From: Kurt Schaefer <ktschaefer@gmail.com>
Sent: Monday, April 05, 2021 7:10 PM
To: Barillas, Martha
Cc: Berrios, Ilka
Subject: [External_Sender] Re: PRM-50-112 April 2021 Status Update to Petitioner
Attachments: KurtSchaeferResume.docx; Proto-Typical Safety Analysis Report Writers Guide R1.pdf; Generating LARs A&KRpt-0301Rev3.pdf; Generic Nuclear Power Plant Siting Guidance.pdf

Dear Ms Barillas;

Thank you for your email update.

The Important to Safety (ITS) criteria in PRM-50-112 are applicable to all of the certified reactor designs, and are probably directly applicable to the new/future fission based nuclear power plants. There have been numerous articles discussing the need to speedup future plant licensing, but no solution. In my 45 years of nuclear power experience, I have produced two FSARs and three revisions of the ESBWR DCD, and I know from experience that at least 40% of the information in the DCDs todate, can be eliminated if detailed ITS criteria are used to limit the information in a PSAR/FSAR/DCD (submittal SAR).

For example, the ESBWR does not have nor need emergency design generators (DGs) to meet the NRC regulations. However, the NRC staff forced GE to include major writeups and data in DCD Tier 2 Section 8.3 on non-safety DGs, which were only put into the design for investment protection.

Another example, which demonstrates that there is too much information in operating plant UFSARs, is the fact that utilities write hundreds of 10 CFR 50.59 reviews and evaluations every year for changes that affect their FSARs without needing NRC approval.

A detailed set of ITS criteria can and should be used to limit the required information in future SARs. I am retired, and have the time to help in this effort without cost to the NRC. If the NRC desires, I would gladly support you in this effort.

To demonstrate my expertise, I have attached my resume and a couple of my guidelines manuals, listed at the end of my resume. Note; the manuals

are the NRC's to use any way you wish, and if you wish copies of the other manuals, I will gladly provide them.

You may contact me any time, if you have any questions or would like my help.

Regards;

Kurt T. Schaefer

510 928-9464

On Mon, Apr 5, 2021 at 10:06 AM Barillas, Martha <Martha.Barillas@nrc.gov> wrote:

Mr. Schaefer,

I contact you to provide a status update on the petition for rulemaking that you submitted to the U. S. Nuclear Regulatory Commission (NRC), dated July 20, 2015, and supplemented on August 31, 2015. In your petition, you requested that the NRC amend Part 50 of Title 10 of the Code of Federal Regulations (10 CFR), "Domestic licensing of production and utilization facilities," by defining and providing a set of criteria "for determining which structures, systems, components and functions are 'important to safety.'" The NRC docketed your letters as petition for rulemaking PRM-50-112, and the NRC published a notice of receipt in the Federal Register on January 6, 2016 (81 FR 410).

The NRC continues to evaluate and to address the resolution of the issues raised by PRM-50-112. Once the petition has been resolved, the NRC will publish a notice in the Federal Register explaining the NRC's finding. You will also receive a letter at that time, notifying you of the action that the NRC has taken. In the interim, the status of PRM-50-112 can be found at the NRC Rules and Petitions page at <https://www.nrc.gov/readingrm/doc-collections/rulemaking-ruleforum/active/PetitionIndex.html>. At this web site, there is a link to a listing of all active NRC PRMs. You can monitor this site for status updates as they become available. You can also continue to monitor the docket for PRM-50-112 at <https://www.regulations.gov>. The Federal rulemaking web site allows you to receive alerts when changes or additions occur in a docket folder. To subscribe: 1) navigate to the docket folder (NRC-2015-0213); 2) click the "Sign up for E-mail Alerts" link; then 3) enter your email address and select how frequently you would like to receive emails (e.g., daily, weekly, or monthly).

If you have any questions, please contact me by replying to this email.

Sincerely,

Martha Barillas-Project Manager

NMSS/REFS/RRPB

US Nuclear Regulatory Commission

301-415-2760

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