

# Harmonization of NRC Transportation Safety Requirements with IAEA Standards

Council on Radionuclides and Radiopharmaceuticals, Inc.  
Transportation Committee

**James Firth, Project Manager**

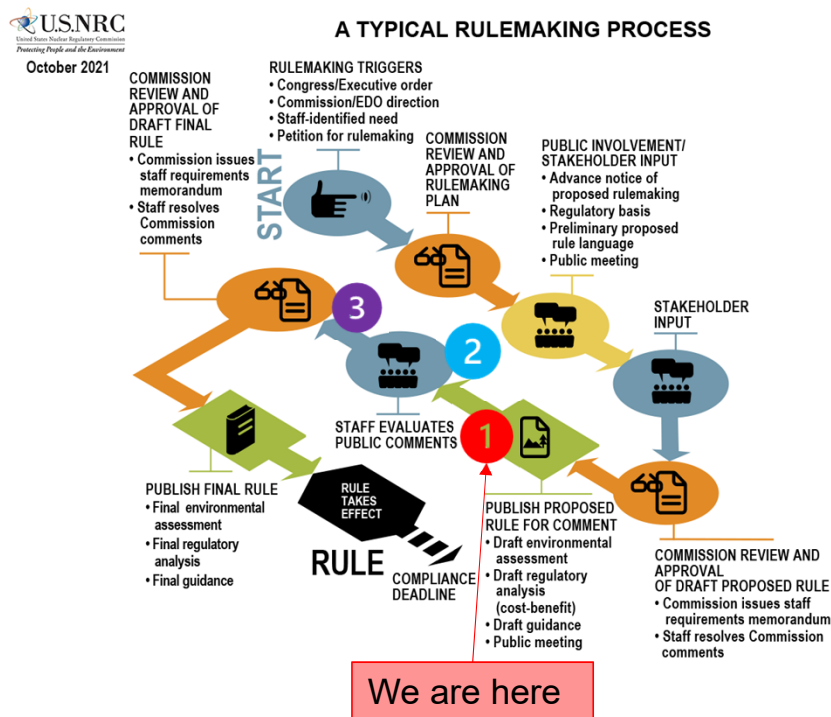
Division of Rulemaking, Environmental, and Financial Support  
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November 15, 2022

# Rulemaking Process and Current Status



- Proposed rule published in the *Federal Register* on September 12, 2022
  - 75-day comment period
  - Comment period closes on November 28, 2022
- We are currently within the public comment period **1**
- Public comment period ends: November 28, 2022 **2**
- Staff will respond to comments and develop a final rule
- Final rule currently due to the Commission: February 2024 **3**

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## Status of Harmonization and Compatibility with DOT Regulations

- The NRC is proposing changes to Regulatory Guide 7.9 and has published draft regulatory guide 7011, “Standard Format and Content of Part 71 Applications for Approval of Packages for Radioactive Material,” for public comment.
- The proposed rule was published in the *Federal Register* on September 12, 2022 (87 FR 55708) with a 75-day comment period.
  - The comment period ends November 28, 2022.
- The U.S. Department of Transportation (DOT) published a related proposed rule on September 12, 2022 (87 FR 55743) with a 90-day public comment period.

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# Proposed Rule and Related Documents

- **Regulations.gov Docket: NRC-2016-0179**
  - <https://www.regulations.gov/docket/NRC-2016-0179>
- **Proposed Rule**
  - Citation: 87 FR 55708 (September 12, 2022)
  - <https://www.govinfo.gov/content/pkg/FR-2022-09-12/pdf/2022-18520.pdf>
- **Supporting & Related Material**
  - Draft Regulatory Analysis ([ML22209A039](#))
  - Draft Environmental Assessment ([ML22209A045](#))
  - Draft Supporting Statement for Information Collections ([ML22209A052](#))

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# Proposed Rule and Related Documents

- **Correction notice**

- Citation: [87 FR 65177](#) (October 28, 2022)

- **Corrections and Changes**

- Corrected information collection
    - Changed the number of responses from 7.5 to 100 and the number of respondents from 6.5 to 99
    - The overall burden does not change (rounded to a total of 1,377 hours)
    - Comment period for the information collection extended until November 28, 2022
  - Republished Draft Regulatory Analysis (correcting a publication error)
  - Clarified the units for the mass limit (changed “140 g” to “140 grams”)

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# Proposed Rule and Related Documents

- **Guidance Document**

- Draft Regulatory Guide DG-7011, “Standard Format and Content of Part 71 Applications for Approval of Packages for Radioactive Material” ([ML22223A085](#))
- Unofficial redline/strikeout comparison between DG-7011 and Regulatory Guide 7.9, (Revision 2), “Standard Format and Content of Part 71 Applications for Approval of Packages for Radioactive Material” ([ML22280A061](#))

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# International Atomic Energy Agency Harmonization

- Fissile material exemptions
- Revise insolation requirements for package evaluations
  - Revise units for insolation for normal conditions of transport
  - Include insolation for Hypothetical Accident Conditions
- Include Definition for Radiation Level
- Delete Low Specific Activity-III Leaching Test\*
- Include New Definition for Surface Contaminated Object\*
- Revise Uranium Hexafluoride Package Requirements
- Include Evaluation of Aging Mechanisms and a Maintenance Program
- Revise Transitional Arrangements\*
- Include Head Space for Liquid Expansion\*
- Revise Tables Containing  $A_1$  and  $A_2$  Values and Exempt Material Activity and Consignment Limits\*

\* Changes to harmonize with U.S. Department of Transportation and International Atomic Energy Agency Specific Safety Requirements (SSR) No. 6

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## Part 71: NRC-Initiated Changes

- Biennial quality assurance reporting (§ 71.106)
- Remove Type A limits from general license requirements (§§ 71.22, 71.23)
- Revise the determination of the mass limits containing mixed quantities of fissile material when uranium-233 is present (§ 71.22)
- Revise compatibility category designations for quality assurance requirements (Subpart H)
- Remove duplicative reporting (§ 71.95)
- Revise the definition of *Low Specific Activity (LSA) Material* (§ 71.4)
- Remove references to irradiated reactor fuel in the advance notification requirements (§ 71.97)



# Revision of Tables Containing $A_1$ and $A_2$ Values and Exempt Material Activity and Consignment Limits

**Where is this discussed in the FRN?**

- Section III.C. (Issue Number 15.3) (page 55719)

**Which sections of the CFR would be amended?**

- 10 CFR 71, Appendix A, Tables A-1 and A-2

**What are the current and proposed compatibility categories?**

- [B] → [B]

- **Summary:**

- NRC proposes revising 10 CFR 71, Appendix A, Tables A-1 and A-2

- **Additional information:**

- Seven radionuclides would be added
- Footnote c for Thorium-natural would be revised
- Alphabetical listing of radionuclides would be revised
- Would align with DOT

IAEA Harmonization

Conform to DOT

## Inclusion of Evaluation of Aging Mechanisms and a Maintenance Program

**Where is this discussed in the FRN?**

- Section III.C. (Issue Number 9) (pages 55714–55715)

**Which sections of the CFR would be amended?**

- 10 CFR 71.35(d) 10 CFR 71.43(d)

**What are the current and proposed compatibility categories?**

- [--] → NRC and NRC → NRC

- **Summary:**

- Would add a requirement in § 71.35(d) for the application for package approval to include a description of the package maintenance program
- Would revise § 71.43(d) to include the evaluation of the effects of aging

- **Additional information:**

- IAEA added requirement for applications for package approval include a maintenance program and evaluation of the effects of aging
- No burden on NRC certificate holders since applications for NRC package approval already include both

# Revision of Transitional Arrangements

**Where is this discussed in the FRN?**

- Section III.C. (Issue Number 10) (pages 55715–55716)

**Which sections of the CFR would be amended?**

- 10 CFR 71.19

**What are the current and proposed compatibility categories?**

- NRC → NRC

- **Summary:**

- Phase out older packages without a “–85” or “–96” in the package identification number
- Limit use of packages with a “–96” in the package identification number to those whose fabrication has been completed by December 31, 2028
- Limit fabrication of special form sources

- **Additional information:**

- Proposing to revise § 71.19 to allow existing packages be recertified to show compliance with the revised regulations and remove restrictions on package use and fabrication

IAEA Harmonization

Conform to DOT

# Inclusion of Head Space for Liquid Expansion

**Where is this discussed in the FRN?**

- Section III.C. (Issue Number 11) (pages 55716–55717)

**Which sections of the CFR would be amended?**

- 10 CFR 71.43(i)

**What are the current and proposed compatibility categories?**

- [--] → NRC

- **Summary:**

- Would add a design requirement in § 71.43(i) for packages containing liquids to ensure adequate space for liquid expansion during evaluation of the normal conditions of transport and hypothetical accident conditions

- **Additional information:**

- Ensure consistency with § 71.87(d)

# Deletion of Duplicative Reporting Requirements

**Where is this discussed in the FRN?**

- Section III.C. (Issue Number 15.1) (page 55719)

**Which sections of the CFR would be amended?**

- 10 CFR 71.95(a)(3)

**What are the current and proposed compatibility categories?**

- D → [--]

- **Summary:**

- Proposes to remove reporting requirement in § 71.95(a)(3), which is duplicative of paragraph (b)

- **Additional information:**

- None

NRC-Initiated

# Quality Assurance Program (QAP) Biennial Report Issue

**Where is this discussed in the FRN?**

- Section III.C. (Issue Number 12) (pages 55717)

**Which sections of the CFR would be amended?**

- 10 CFR 71.106

**What are the current and proposed compatibility categories?**

- C → B

- **Summary:**

- Clarification of requirements for biennial reports for QAP changes

- **Additional information:**

- Proposed change modifies language in § 71.106 to clarify that biennial reports are required even when no changes have been made to an NRC-approved QAP in the previous 24-month period
  - Consistent with 10 CFR 50 reporting requirements [§§ 50.54(a)(3) and 50.71(e)(2)]
  - Would match guidance currently provided in RG 7.10
  - Would remove regulatory uncertainty

NRC-Initiated

# Revision to Agreement State Compatibility Categories

**Where is this discussed in the FRN?**

- Section III.C.(Issue Number 15.4) (pages 55719–55720)

**Which sections of the CFR would be amended?**

- N/A

**What are the current and proposed compatibility categories?**

- NRC → B, §§ 71.109, 71.111, 71.113, 71.115, 71.117, 71.119, 71.121, 71.123, and 71.125
- D → C, §§ 71.95

- **Summary:**

- Regulations that contain QAP review criteria would be revised from Compatibility Category NRC to Compatibility Category B so Agreement States can approve, inspect, and enforce their licensees' QAPs
- Reporting requirements in § 71.95 would change from Compatibility Category D to Compatibility Category C, so State licensees would report to:
  - NRC for instances of package defects or a reduction in effectiveness
  - State regulator for instances where the CoC was not followed in making a shipment

- **Additional information:**

- §§ 71.109, 71.111, 71.113, 71.115, 71.117, 71.119, 71.121, 71.123, and 71.125 would be revised from Compatibility Category NRC to Compatibility Category B
- § 71.95 would be revised from Compatibility Category D to Compatibility Category C

NRC-Initiated

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# Draft Regulatory Guide

**Where is this discussed in the FRN?**

- Section XVII (pages 55727–55728)

**Which sections of the CFR would be amended?**

- N/A

**What are the current and proposed compatibility categories?**

- N/A

- Draft Regulatory Guide DG-7011, “Standard Format and Content of Part 71 Applications for Approval of Packages for Radioactive Material” ([ML22223A085](#))
  - Added detail on air transport requirements in structural and thermal chapters
  - Moved information on materials evaluations to Chapter 7
  - Added Chapter 10 on Quality Assurance
- Unofficial Redline/Strikeout Version of draft guidance (ML22280A061)



# Requests for Comments

## Where is this discussed in the FRN?

- Section IV, "Specific Request for Comment," (pages 55720–55722), Section IX, "Cumulative Effects of Regulation," (page 55724)

## IV. Specific Request for Comment:

1. IAEA Changes in SSR–6 (2018 Edition) Not in the Scope of This Proposed Rule
2. Removing Tables A–1 Through A–4 in Appendix A to 10 CFR Part 71
3. Merits of Requiring a Biennial Report for No Changes to a Quality Assurance Program

## IX. Cumulative Effects of Regulation:

1. Does the proposed rule's effective date provide sufficient time to implement the new proposed requirements?
2. If current or projected cumulative effects of regulation challenges exist, what should be done to address this situation?
3. Do other regulatory actions (from the NRC or other agency) influence the implementation of the proposed rule's requirements?
4. Are there unintended consequences? Does the proposed rule create conditions that would be contrary to the proposed rule's purpose and objectives? If so, what are the unintended consequences, and how should they be addressed?
5. Please comment on the NRC's cost and benefit estimates in the regulatory analysis that supports this proposed rule.

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# Questions and Discussion

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# Acronyms

CFR	<i>Code of Federal Regulations</i>	RG	regulatory guide
CoC	Certificate of Compliance	SSR	Specific Safety Requirements
DG	Draft regulatory guide		
DOT	U.S. Department of Transportation		
FAQs	Frequently Asked Questions		
FR	<i>Federal Register</i>		
H&S	Health and safety		
IAEA	International Atomic Energy Agency		
LSA	Low Specific Activity		
NRC	U.S. Nuclear Regulatory Commission		
QAP	Quality Assurance Program		

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# Background

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# Compatibility

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# Compatibility Categories A and B

**Where is this discussed in the FRN?**

- Section XV. (pages 55725–55727)

**Which sections of the CFR would be amended?**

- N/A

**What are the current and proposed compatibility categories?**

- See Compatibility Table

## Compatibility Category A

- Basic radiation protection standards and scientific terms and definitions that are necessary to understand radiation protection concepts.
- Should be essentially identical to those of the NRC to provide uniformity in the regulation of agreement material on a nationwide basis.

## Compatibility Category B

- Activities that cross jurisdictional boundaries.
- Need to be adopted in an essentially identical manner in order to ensure uniformity of a regulation on a national basis.

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# Compatibility Category C

**Where is this discussed in the FRN?**

- Section XV. (pages 55725–55727)

**Which sections of the CFR would be amended?**

- N/A

**What are the current and proposed compatibility categories?**

- See Compatibility Table

## Compatibility Category C

- Program elements that are important for an Agreement State to have in order to avoid conflict, duplication, gaps, or other conditions that would jeopardize an orderly pattern in the regulation of agreement material on a nationwide basis.
- Agreement State program elements must embody the essential objectives of these NRC program elements.
- May be more restrictive than the NRC program elements provided that the essential objective is met, and the State requirements do not jeopardize an orderly pattern of regulation of agreement material on a nationwide basis.



# Compatibility Category D

**Where is this discussed in the FRN?**

- Section XV. (pages 55725–55727)

**Which sections of the CFR would be amended?**

- N/A

**What are the current and proposed compatibility categories?**

- See Compatibility Table

## Compatibility Category D

- Program elements that do not meet any of the criteria of Compatibility Categories A, B, or C, or have a particular health and safety role.
- Do not need to be adopted by Agreement States for purposes of compatibility.
- An Agreement State may adopt and implement these program elements that fall within its jurisdiction.
- If adopted, the program element should be adopted in a manner such that:
- They are comparable with those of the NRC,
- They do not preclude, or effectively preclude a practice in the national interest without adequate protection of public health and safety, security, or environmental basis related to radiation protection, and
- They do not preclude, or effectively preclude the ability of the NRC to evaluate the effectiveness of the Agreement State program with respect to the protection of public health and safety.

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# Compatibility Categories NRC and H&S

**Where is this discussed in the FRN?**

- Section XV. (pages 55725–55727)

**Which sections of the CFR would be amended?**

- N/A

**What are the current and proposed compatibility categories?**

- See Compatibility Table

## Compatibility Category NRC

- Program elements that address areas of regulation that cannot be discontinued when a State enters into an Agreement with the NRC pursuant to the Atomic Energy Act or provisions of Title 10 of the Code of Federal Regulations (CFR).
- The NRC maintains regulatory authority over these program elements.
- Agreement States must not adopt these NRC program elements.

## Compatibility Category H&S

- Program elements that embody the basic health and safety aspects of the NRC's program elements because of particular health and safety considerations.
- Must be adopted by Agreement States.
- Not required for compatibility.

# Compatibility Table: Compatibility Categories and Changes

## Where is this discussed in the FRN?

- Section XV. (pages 55726–55727)

## Which sections of the CFR would be amended?

- N/A

## What are the current and proposed compatibility categories?

- See Compatibility Table

Section	Change	Subject	Compatibility	
			Existing	New
71.0(d)(1)	Revised	Purpose and Scope	D	D
71.4	New	Definition: Radiation Level	---	[A]
71.4	Revised	Definition: Low Specific Activity (LSA) material [Deletion of Low Specific Activity-III Leaching Test]	[B]	[B]
71.4	Revised	Definition: Special form radioactive material	[B]	[B]
71.4	Revised	Definition: Surface Contaminated Object (SCO)	[B]	[B]
71.15(a) and (d)	Revised	Exemption from classification as fissile material	[B]	[B]
71.15(g)	New	Exemption from classification as fissile material	-	[B]
71.17(e)	Revised	General license: NRC-approved package.	B	B
71.19	Revised	Previously approved package	NRC	NRC
71.22(a), (c), and (e)(3) through (5)	Revised	General license: Fissile material	[B]	[B]
71.22(f) through (h)	New	General license: Fissile material	---	[B]
71.23(a) and (c)	Revised	General license: Plutonium-beryllium special form material	[B]	[B]
71.23(f) through (h)	New	General license: Plutonium-beryllium special form material	---	[B]
71.31(a)	Revised	Contents of application	NRC	NRC
71.35(b) and (c)	Revised	Package evaluation	NRC	NRC
71.35(d)	New	Package evaluation	--	NRC
71.43(d)	Revised	General standards for all packages	NRC	NRC
71.43(i)	New	General standards for all packages	---	NRC
71.55(g)	Revised	General requirements for fissile material packages	NRC	NRC
71.71(c)(1)	Revised	Normal conditions of transport	NRC	NRC
71.73(b)	Revised	Hypothetical accident conditions	NRC	NRC
71.77	Removed	Qualification of LSA-III Material	NRC	---
71.95	Revised compatibility category	Reports	D	C**
71.95(a)(3)	Removed	Reports	D	*
71.97	Revised	Advance notification of shipment of irradiated reactor fuel and nuclear waste	B	B
71.100	Revised	Criminal penalties	D	D
71.101(b)	Revised compatibility category	Quality assurance requirements	C***	B***
71.101(c)(1)	Revised compatibility category	Quality assurance requirements	C***	B**

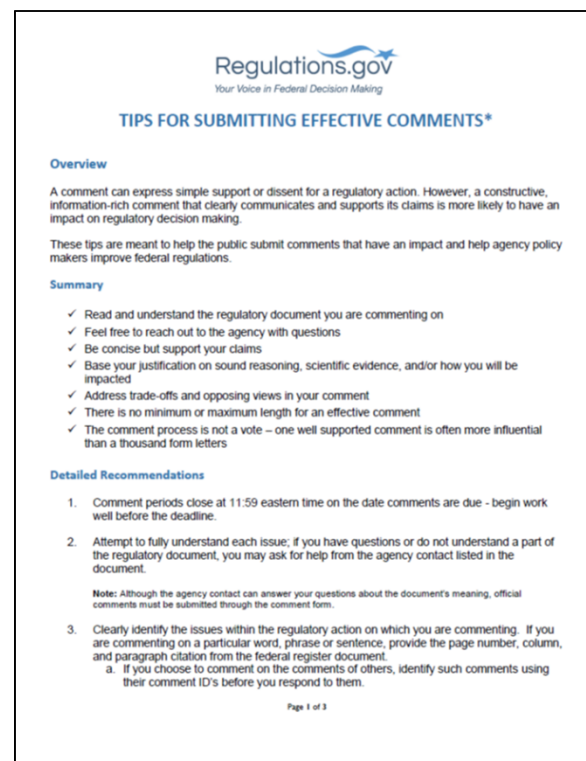
Section	Change	Subject	Compatibility	
			Existing	New
71.103 (a) and (b)	Revised compatibility category	Quality assurance organization	C***	B**
71.103 (c), (d), (e) and (f)	Revised compatibility category	Quality assurance organization	D	B**
71.105	Revised compatibility category	Quality assurance program	C	B**
71.106	Revised compatibility category	Changes to quality assurance program	C	B**
71.109	Revised compatibility category	Procurement document control	NRC	B**
71.111	Revised compatibility category	Instructions, procedures and drawings	NRC	B**
71.113	Revised compatibility category	Document control	NRC	B**
71.115	Revised compatibility category	Control of purchased material, equipment, and services	NRC	B**
71.117	Revised compatibility category	Identification and control of materials, parts and components	NRC	B**
71.119	Revised compatibility category	Control of special processes	NRC	B**
71.121	Revised compatibility category	Internal inspection	NRC	B**
71.123	Revised compatibility category	Test control	NRC	B**
71.125	Revised compatibility category	Control of measuring and test equipment	NRC	B**
71.127	Revised compatibility category	Handling, storage, and shipping control	[C]	B**
71.129	Revised compatibility category	Inspection, test, and operating status	[C]	B**
71.131	Revised compatibility category	Nonconforming materials, parts, or components	[C]	B**
71.133	Revised compatibility category	Corrective action	C	B**
71.135	Revised compatibility category	Quality assurance records	C***	C**
71.137	Revised compatibility category	Audits	C	C**
Table A-1 in Appendix A to 10 CFR Part 71	Revised	A <sub>1</sub> and A <sub>2</sub> Values for Radionuclides	[B]	[B]
Table A-2 in Appendix A to 10 CFR Part 71	Revised	Exempt Material Activity Concentrations and Exempt Consignment Activity Limits for Radionuclides	[B]	[B]

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# Resources for Preparing and Submitting Comments

# Commenter's Checklist on Regulations.gov

- Available from [Regulations.gov](https://downloads.regulations.gov/FIS-2018-0053-0007/content.pdf) at:  
<https://downloads.regulations.gov/FIS-2018-0053-0007/content.pdf>
- This information is also available from the page for submitting comments on the proposed rule:  
<https://www.regulations.gov/comment/NRC-2016-0179-0072>



# Submitting a comment

- Frequently Asked Questions (FAQs) on commenting are available at:  
<https://www.regulations.gov/faq>
- **Ways You Can Submit Comments:**
  - **Regulations.gov:** [comment form](#) for the proposed rule on docket NRC–2016–0179
  - or
  - **Email:** [Rulemaking.Comments@nrc.gov](mailto:Rulemaking.Comments@nrc.gov)
  - or
  - **Mail:** Secretary, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, ATTN: Rulemakings and Adjudications Staff

55708	
Proposed Rules	
Federal Register Vol. 87, No. 175 Monday, September 12, 2022	
<p>This section of the FEDERAL REGISTER contains notices to the public of the proposed issuance of rules and regulations. The purpose of these notices is to give interested persons an opportunity to participate in the rule making prior to the adoption of the final rules.</p> <p>• <b>Email comments to:</b> <a href="mailto:Rulemaking.Comments@nrc.gov">Rulemaking.Comments@nrc.gov</a>. If you do not receive an automatic email reply confirming receipt, then contact us at 301-415-1677.</p> <p>• <b>Mail comments to:</b> Secretary, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, ATTN: Rulemakings and Adjudications Staff.</p> <p>For additional direction on obtaining information and submitting comments, see "Obtaining Information and Submitting Comments" in the SUPPLEMENTARY INFORMATION section of this document.</p> <p><b>FOR FURTHER INFORMATION CONTACT:</b> James Firth, 301-415-4628, email: <a href="mailto:James.Firth@nrc.gov">James.Firth@nrc.gov</a>; or Bernard White, 301-415-6577, email: <a href="mailto:Bernard.White@nrc.gov">Bernard.White@nrc.gov</a>. Both are staff of the Office of Nuclear Material Safety and Safeguards, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.</p> <p><b>SUPPLEMENTARY INFORMATION:</b></p> <p><b>Table of Contents</b></p> <p>I. Obtaining Information and Submitting Comments</p> <p>A. Obtaining Information</p> <p>B. Submitting Comments</p> <p>II. Background</p> <p>III. Discussion</p> <p>A. Action the NRC is Proposing To Take</p> <p>B. Applicability of the Proposed Action</p> <p>C. Discussion of Issues Specific Request for Comment</p> <p>IV. Specific Request for Comment</p> <p>V. Section-by-Section Analysis</p> <p>VI. Regulatory Flexibility Certification</p> <p>VII. Regulatory Analysis</p> <p>VIII. Backfitting and Issue Finality</p> <p>IX. Cumulative Effects of Regulation</p> <p>X. Plain Writing</p> <p>XI. Environmental Assessment and Proposed Finding of No Significant Environmental Impact</p> <p>XII. Paperwork Reduction Act</p> <p>XIII. Criminal Penalties</p> <p>XIV. Coordination with NRC Agreement States</p> <p>XV. Compatibility of Agreement State Regulations</p> <p>XVI. Voluntary Consensus Standards</p> <p>XVII. Availability of Guidance</p> <p>XVIII. Public Meeting</p> <p>XIX. Availability of Documents</p> <p><b>DATES:</b> Submit comments by November 28, 2022. Comments received after this date will be considered if it is practical to do so, but the NRC is able to ensure consideration only for comments received on or before this date.</p> <p><b>ADDRESSES:</b> You may submit comments by any of the following methods:</p> <ul style="list-style-type: none"><li>• <b>Federal rulemaking website:</b> Go to <a href="https://www.regulations.gov">https://www.regulations.gov</a> and search for Docket ID NRC-2016-0179. Address questions about NRC dockets to Dawn Forder, telephone: 301-415-3407; email: <a href="mailto:Dawn.Forder@nrc.gov">Dawn.Forder@nrc.gov</a>. For technical questions contact the individual or individuals listed in the FOR FURTHER INFORMATION CONTACT section of this document.</li><li>• <b>Obtaining Information and Submitting Comments</b> A. <b>Obtaining Information</b> Please refer to Docket ID NRC-2016-0179 when contacting the NRC about the availability of information for this action. You may obtain publicly-available information related to this action by any of the following methods:<ul style="list-style-type: none"><li>• <b>Federal Rulemaking Website:</b> Go to <a href="https://www.regulations.gov">https://www.regulations.gov</a> and search for Docket ID NRC-2016-0179.</li><li>• <b>NRC's Agencywide Documents Access and Management System (ADAMS):</b> You may obtain publicly-available documents online in the ADAMS Public Documents collection at <a href="https://www.nrc.gov/readings/adams.html">https://www.nrc.gov/readings/adams.html</a>. To begin the search, select "Begin Web-based ADAMS Search." For problems with ADAMS, please contact the NRC's Public Document Room (PDR) reference staff at 1-800-397-4209, 301-415-4737, or by email to <a href="mailto:PDR.Resource@nrc.gov">PDR.Resource@nrc.gov</a>. For the convenience of the reader, instructions about obtaining materials referenced in this document are provided in the "Availability of Documents" section.</li><li>• <b>NRC's PDR:</b> You may examine and purchase copies of public documents, by appointment, at the PDR, Room P1 E35, One White Flint North, 11555 Rockville Pike, Rockville, Maryland 20852. To make an appointment to visit the PDR, please send an email to <a href="mailto:PDR.Resource@nrc.gov">PDR.Resource@nrc.gov</a> or call 1-800-397-4209 or 301-415-4737, between 8:00 a.m. and 4:00 p.m. eastern time (ET), Monday through Friday, except Federal holidays.</li></ul></li><li>B. <b>Submitting Comments</b> Please include Docket ID NRC-2016-0179 in your comment submission. The NRC cautions you not to include identifying or contact information that you do not want to be publicly disclosed in your comment submission. The NRC will post all comment submissions at <a href="https://www.regulations.gov">https://www.regulations.gov</a> as well as enter the comment submissions into ADAMS. The NRC does not routinely edit comment submissions to remove identifying or contact information that they do not want to be publicly disclosed.</li></ul>	