

Baker comment.htm.txt

```
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<H1>Revised Requirements for the Domestic Licensing of Special Nuclear
Material, 10 CFR Part 70</H1>

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Criticality safety

<p>
From: James S. Baker <i>jbaker@lanl.gov</i>

Date: 2/3/99 8:34:42

Thread ID: 5.1.1

<p>
I urge the NRC to carefully review and act up the recommendations

made by NEI and Dr. McLaughlin relative to the proposed 10CFR70

revisions. I will not repeat their statements, except to emphasize

the following point.

The ANSI/ANS-8 series of standards provide terse, yet

comprehensive guidelines for the practice of nuclear criticality

safety (NCS). Deviating from these guidelines will almost always

lead to wasted time and effort, and a decrease in real safety. If
safety is the primary goal, then the NRC must encourage compliance to
these standards. The NRC must understand the varied nature of
activities of concern to NCS practitioners, and why they demand a

different approach to safety than commercial reactors. Then the

wisdom of using the standards alone will be obvious.

</html>