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Physical Protection of Category 1 and Category 2 Quantities of Radioactive Materials

Comment On: NRC-2015-0109-0001

Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material; Request for Comment

Document: NRC-2015-0109-DRAFT-0016

Comment on FR Doc # 2016-05260

12

Submitter Information

81 FR 13263

3/14/2016

Name: Scott Bauer

Submitter's Representative: Steve Meyer

Organization: STARS Alliance

General Comment

See attached file(s)

Attachments

STARS-16002

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Diablo Canyon Power Plant
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Wolf Creek Generating Station

STARS-16002

May 13, 2016

Ms. Cindy Bladey
Office of Administration, Mail Stop: OWFN-12-H08
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: STARS Alliance Feedback on 10 CFR Part 37; 81 Federal Register 13263, Docket No. NRC-2015-0109

References: 1. Letter from Nima Ashkeboussi, Nuclear Energy Institute (NEI) to Ms. Cindy Bladey, Office of Administration, "NEI Input on 10 CFR 37 Program Review (81 Fed. Reg. 13263); Docket ID NRC-2015-0109," dated May 13, 2016

2. STARS-15001, "Petition to Amend Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material: Requests for Comments," January 12, 2015

Dear Ms. Bladey:

STARS Alliance (STARS) appreciates the opportunity to provide comments on the overall effectiveness and clarity of the requirements for 10 CFR 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material." On July 12, 2014, NEI submitted a petition for rulemaking (PRM-37-1) to amend Part 37 to remove unnecessary and burdensome requirements on power reactor licensees with established Part 73 security programs. STARS letter 15001, dated January 12, 2015, endorsed the NEI petition and recommended that the NRC promptly initiate rulemaking to implement the proposed changes. Additional recommended changes to Part 37 were provided in STARS-15001. Although the NRC did not request feedback regarding the priority of PRM-37-1 in the referenced Federal Register Notice, STARS would like to emphasize the importance of the need to amend Part 37 in order to eliminate the overlapping and conflicting requirements between Part 37 and Part 73 for power reactor licensees. These Part 37 requirements do not increase the security of Category 1 and 2 quantities of radioactive materials that are covered under the physical protection requirements of 10 CFR Part 73.

STARS believes that resolution of the NEI petition for rulemaking is the most effective path forward that will result in the needed improvements in the overall effectiveness and clarity of the requirements of 10 CFR 37.

STARS also endorses the specific comments which provide feedback on 10 CFR 37 and related guidance documents submitted by NEI in their letter written on behalf of the nuclear energy industry (Reference 1).

If you have any questions, please contact me at 623-239-4359, or scott.bauer@starsalliance.com.

A handwritten signature in black ink, appearing to read "Scott Bauer", with a stylized, cursive script.

Scott Bauer
Regulatory Affairs Functional Area Manager
STARS Alliance LLC

SJM
