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# PUBLIC SUBMISSION

**Docket:** NRC-2018-0138

Information collection renewal: Request for information pursuant to 10 CFR 50.54(f) regarding recommendations 2.1, 2.3 AND 9.3, of the near term task force review of insights from the Fukushima Dai-ichi Event (3150-0211)

**Comment On:** NRC-2018-0138-0004

Information Collection: Request for Information Pursuant to 10 CFR 50.54(f) Regarding Recommendations 2.1, 2.3 and 9.3, of the Near Term Task Force Review of Insights From the Fukushima Dai-ichi Event

**Document:** NRC-2018-0138-DRAFT-0004

Comment on FR Doc # 2018-26746

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## Submitter Information

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## General Comment

Please accept the following general comments on Information Collection: Request for Information Pursuant to 10 CFR 50.54(f) Regarding Recommendations 2.1, 2.3 and 9.3, of the Near Term Task Force Review of Insights From the Fukushima Dai-ichi Event:

The stated purpose of the 10 CFR 50.54(f) request is to provide further information to support the evaluation of the NRC staff recommendations for the Near-Term Task Force (NTTF) review of the accident at the Fukushima Dai-ichi nuclear facility. The review will enable the staff to determine whether the nuclear plant licenses under your responsibility should be modified, suspended, or revoked Information resulting . will help the staff decide upon the most appropriate regulatory action focusing on the most beneficial safety enhancements. It is further stated in the Information Request Justification that The NRC staffs goal is to complete Phase 1 and collect sufficient information to make a regulatory decision for most plants within five years. It is my opinion that sufficient information has been collected in the time since the initial request was made in March 2012 for the NRC to make a regulatory decision on whether the nuclear plant licenses under your responsibility should be modified, suspended, or revoked.

Specific to the requested 4 questions in the FRN here are comments:

1. Is the proposed collection of information necessary for the NRC to properly perform its functions? Does the information have practical utility?

a. No there has been sufficient information collected for the NRC staff to make a determination on future actions without obtaining information from all plants. The remaining information does not enhance the knowledge associated with the Flood or Seismic Hazards evaluations by the NRC.

2. Is the estimate of the burden of the information collection accurate?
  - a. The burden of information collection for this 10 CFR 50.54(f) has been and remains underestimated.
3. Is there a way to enhance the quality, utility, and clarity of the information to be collected?
  - a. Yes, do not require collection of the remaining information since there is already sufficient information collected for NRC staff to perform the evaluation stated in the 10 CFR 50.54(f) letter.
4. How can the burden of the information collection on respondents be minimized, including the use of automated collection techniques or other forms of information technology?
  - a. By utilizing the sufficient information already collected on these topics and not requiring 100% of the Nuclear Units to provide information since there is no new information expected from the effort.