

PUBLIC SUBMISSION

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Docket: NRC-2016-0024

OMB Clearance Package for 3150-0035, 10 CFR Part 21, "Reporting of Defects and Noncompliance"

Comment On: NRC-2016-0024-0001

Information Collection: Reporting of Defects and Noncompliance

Document: NRC-2016-0024-DRAFT-0003

Comment on FR Doc # 2016-21541

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General Comment

GE Hitachi Nuclear Energy (GEH) Response to NRC - 2016-0024

Question - Is the proposed collection of information necessary for the NRC to properly perform its functions?

Answer - Yes. In order to accurately understand the burden placed on suppliers and licensees collection of resource expenditures would be important.

Question - Does the information have practical utility?

Answer - Changes in the regulation that impose additional requirements should be based on a value added basis, based on empirical data. Without this data the cost may outweigh the benefit.

Question - Is the estimate of the burden of the information collection accurate?

Answer - Since the vast majority of 10CFR part 21 evaluations do not result in notifications to the NRC the values noted do not seem to accurately reflect the burden imposed by the regulation.

Question - Is there a way to enhance the quality, utility, and clarity of the information to be collected?

Answer - To accurately understand the burden imposed by the implementation of the requirements of 10CFR Part 21 the NRC should solicit information from the largest contributors to the overall industry burden (in a confidential manner) for all aspects of the 10CFR Part 21 process, from initiation through notifications, including all non-reported (i.e. Safe) conditions, as this category (from the GEH perspective) is the largest family of evaluations.

Question - 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?

Answer - Automated collection would appear to add additional burden and in many cases may not be possible. GEH believes that a simple request for information (held by the NRC in confidence) would be the best approach.

Comment - While it may be important for the NRC to gain the requested information on the burden posed to suppliers and licensees, the fact that the NRC no longer posts the notifications to the 10CFR Part 21 Notifications portal in a timely manner is disconcerting given the burden that it places on the suppliers and licensees, and defeats the purpose of maintaining plant safety when safety concerns are raised. It is true that 10CFR Part 21 Reports are posted to the daily event report portal (for 10CFR 50.72 and 50.73 reports), however, without monitoring on both portals valuable safety information can be missed, and not acted upon in a timely manner.