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A. Beranek

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US NRC

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June 20, 1997

Secretary
US Nuclear Regulatory Commission
Washington, D.C. 20555-0001
Attention: Rulemakings and Adjudications Staff

SERIAL: GDP 97-0104

Paducah Gaseous Diffusion Plant (PGDP)
Portsmouth Gaseous Diffusion Plant (PORTS)
Docket Nos. 70-7001 and 70-7002
USEC Comments on Draft Regulatory Guide, "Use of Fixed Neutron Absorbers at Fuels and Materials Facilities," 62 Fed. Reg. 16629 (April 7, 1997)

Dear Sir:

On behalf of the United States Enrichment Corporation (USEC), I am pleased to provide the following comment on the NRC's draft Regulatory Guide, "Use of Fixed Neutron Absorbers at Fuels and Materials Facilities," for your consideration.

Comment: Section C, Regulatory Position, first paragraph, last sentence - This sentence, as worded, implies incorrectly that detailed NCS analyses are submitted to the NRC for review and/or approval. The wording should be revised to indicate that the analyses are approved per the requirements of the license or certificate.

Recommendation: Revise the sentence as indicated. "ANSI/ANS-8.21-1995, however, is not a substitute for ~~preparing and submitting~~ the preparation and approval of detailed nuclear criticality safety analyses for specific operations.

We would be pleased to discuss this comment with you. Please contact me at (301) 564-3413 or Ms. Lisamarie Jarriel at (301) 564-3247.

Sincerely,

Robert L. Woolley
Nuclear Regulatory Assurance and Policy Manager

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Fax Memorandum

*Rules Review and
Directives Branch*

TO: Secretary/Rulemakings and
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DATE: June 20, 1997

TIME: 4:44 pm

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FROM: Robert L. Woolley

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NUMBER OF PAGES (including cover sheet):

SUBJECT: