

D870917

The Honorable Lando W. Zech, Jr.  
Chairman  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Chairman Zech:

SUBJECT: ACRS ACTION ON THE PROPOSED FINAL RULE AMENDMENTS TO 10 CFR  
PART 72, "LICENSING REQUIREMENTS FOR THE INDEPENDENT STORAGE  
OF SPENT NUCLEAR FUEL AND HIGH-LEVEL RADIOACTIVE WASTE"

During the 329th meeting of the ACRS, September 10-12, 1987, we discussed a report from our Subcommittee on Spent Fuel Storage regarding the proposed Final Rule Amendments to 10 CFR Part 72, "Licensing Requirements for the Independent Storage of Spent Nuclear Fuel and High-Level Radioactive Waste."

As a result of this discussion, we concur with the NRC Staff's proposal to issue the subject Final Rule Amendments. However, we note that operators of equipment and controls at facilities licensed under 10 CFR Part 72 would not be licensed by the NRC but are required by NRC regulation to be certified by the licensee. Because these facilities could contain large quantities of special nuclear material, qualification and certification of operators is appropriate. Although NRC requires certification of operators, we are not aware of any NRC guidance or criteria that would be used to determine the adequacy of the qualifications, training, continuing training, and certification of these operators. We believe that NRC should develop such guidance and criteria, and we would like to review them before the licensing of such facilities.

Sincerely,

William Kerr  
Chairman

Reference:

Memorandum from Robert Bosnak, Deputy Director, Office of Nuclear Regulatory Research, dated July 14, 1987, with enclosed proposed Final Rule Amendments to 10 CFR Parts 2, 19, 20, 21, 70, 73, 75, 150 and Part 72, "Licensing Requirements for the Independent Storage of Spent Nuclear Fuel and High-Level Radioactive Waste."

cc: S. J. Chilk, SECY  
T. Rehm, EDO  
E. Beckjord, RES  
G. A. Arlotto, RES

C. Nilsen, RES  
C. Bartlett, RES  
H. Thompson, NMSS  
L. Rouse, NMSS  
R. Hernan, NRR

→