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The following 6 comments were previous submitted 05/15/2022 on [www.regulations.gov](http://www.regulations.gov) and received Comment Tracking Number: I37-e6km-5sf9. It does not appear that any of these comments were addressed in the latest GC-859 draft.

**Comment 1**

"Schedule C.1.1 Data On Discharged Fuel Assemblies and Non-Fuel Components Integral to the Assembly"

There are errors in the 2018 database with respect to Non-Fuel Components (NFC) data. Specifically, C.1.1 NFC data is not consistent with the data for total number of NFCs with code "I" in E.1. See data for reactors 0501 and 1802 for a few examples of this error.

This error is due to the 2018 survey instructions incorrectly assuming that NFCs will never be moved from the host fuel assembly after their initial discharge from the core. This is not true for some reactors (NFCs are sometimes moved between assemblies in spent fuel pool or re-inserted into the core). Starting in the 2018 survey, C.1.1 instructions do not require respondents to report current NFC location data except for those in newly discharged fuel assemblies, so any NFC moves related to previously discharged fuel are missed in the database and cause C.1.1 NFC data to be in error. The C.1.1 data cannot be relied upon to accurately reflect if an assembly contains a NFC. Since no changes were made in the 2022 draft GC-859 with respect to NFCs, this same error will be repeated in the upcoming data collection. How does EIA plan to address and correct the NFC data for the current and upcoming GC-859?

**Comment 2**

"Schedule C.1.3 Fuel Assembly Type Code"

Why is data being requested from July 1, 2013 when this data was already collected in the previous survey and the cover page states that should reflect the spent fuel discharged from January 1, 2018?

**Comment 3**

"Schedule C.1.4 Shipments/Transfers of Discharged Fuel"

The requested data in C.1.4 only addresses fuel assemblies. The GC-859 survey needs to account for offsite shipments of fuel rods (and partial fuel rods) instead of trying to document this information in the database comments.

**Comment 4**

"Schedules F.3.1 Activated Metals and F.3.2 Process Waste/Other Waste"

Both of these tables request data from 2018 – 2020 when this was previously collected in the 2018 GC-859 survey.

**Comment 5**

"Schedule E.4 Non-fuel Components – Separate from an Assembly and Uncanistered"

Data requested in E.4 is redundant with E.1 Status Code "S". E.4 should be removed from the survey to eliminate this redundancy and reduce the reporting burden on respondents.

**Comment 6**

How were respondent comments and suggested improvements to the 2018 GC-859 survey incorporated into the draft 2002 GC-859 survey? Please list all changes made from the 2018 GC-859 respondent feedback.