

April 3, 2000

Mr. Samuel J. Collins
Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Stop O-5 E7
Washington, DC 20555-0001

SUBJECT: Improving Decommissioning Regulations for Nuclear Power Plants

Dear Mr. Collins:

The Commission endorsed two rulemaking initiatives to improve decommissioning regulations in response to a staff proposal in SECY-99-168. The staff envisioned one rulemaking would integrate and risk inform emergency preparedness, insurance, safeguards, and other areas amenable to risk insights. A parallel rulemaking would reconstitute sections of Part 50 that should apply to decommissioning plants. NEI proposes that these two rulemakings be combined. We would expect this decommissioning rulemaking to take about 24 months—the same period anticipated to risk inform Part 50 for operating facilities.

Although a single rulemaking would require more industry resources in the short term, we would be willing to make a commitment to support such an effort because of the benefits that are achievable. Consistency, consolidation of decommissioning issues, and a single, focused NRC management review are some of the benefits. In mid-April, we will submit comments on the risk study, including policy recommendations for use of the study and recommendations for a new subpart to Part 50 on decommissioning.

An additional point for consideration is the benefit that a single rulemaking would have in avoiding confusion on the part of stakeholders, thereby achieving more focused and consistent feedback and comments. We also believe one rulemaking would be more efficient because of the resource savings for NRC and the industry in developing and providing input to one rulemaking.

A single, well-focused effort completed in about two years has merit. We would like to discuss our views regarding the benefits and feasibility of this proposal. We look

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forward to working with the licensing project management staff. To set up a meeting, please contact me or Lynnette Hendricks (202-739-8109 or lxh@nei.org).

Sincerely,

A handwritten signature in black ink, appearing to read "R. Beedle". The signature is fluid and cursive, with a horizontal line extending from the end of the name.

Ralph E. Beedle

c: John A. Zwolinski, Deputy Director, Div. of Licensing Project Management, NRR