

From: "Routh, Stephen" <sdrouth@bechtel.com>
To: "dgeis@nrc.gov" <dgeis@nrc.gov>
Date: 12/21/01 9:48AM
Subject: Bechtel Comments on NUREG-0586, Draft Supplement 1

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December 21, 2001

VIA E-MAIL TO DGEIS@NRC.GOV

Chief, Rules and Directives Branch
Division of Administrative Services
Mail Stop T6 D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Public Comment on Draft Supplement to the Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities, 66 Fed Reg. 56721

Dear Sir or Madam:

The purpose of this letter is to provide Bechtel Power Corporation's comments on draft Supplement 1 to NUREG-0586, "Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities."

Comment #1

Table 4-1 provides estimates of cumulative occupational dose for decommissioning reactors (comparison of the 1988 GEIS to new estimates compiled for draft Supplement 1). In order to reflect the conclusions of Section 4.3.8, it is recommended that a note be added to Table 4-1 to clarify that these estimates of cumulative occupational dose are generic and are not intended to be site-specific limits.

Comment #2

Out-of-scope activities are identified and discussed in Section 1 and Appendix D. It is recommended that "Interim Storage of Greater Than Class C Waste" also be identified as an out-of-scope activity, consistent with the final rule published in Federal Register Vol. 66, Number 197, dated October 11, 2001.

Comment #3

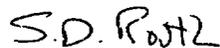
Section 4.3.9 and Appendix I discuss the potential for, and consequences of, postulated radiological accidents. On page I-2 of Appendix I, the text states, "As a result of improvements in the technology used for decommissioning, several of the accidents listed in Table I-2 may now be considered to be of a much lower probability or, at the least, to result in much-reduced consequences." It is recommended that the text be revised to identify typical technology

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improvements. For example, some of the plants currently undergoing decommissioning intend to use single failure proof cranes to preclude the potential for certain postulated spent fuel cask drop or heavy load drop accidents.

Thank you for the opportunity to review and provide comments on draft Supplement 1 to NUREG-0586. Should you have any questions on the comments, please contact me at (301) 228-6245.

Sincerely,

Handwritten signature of Stephen D. Routh in black ink.

Stephen D. Routh
Manager of Regulatory Affairs

From: DGEIS
To: DaM2
Date: 1/7/02 7:25AM
Subject: Fwd: Bechtel Comments on NUREG-0586, Draft Supplement 1

Comments from Bechtel