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Chief, Rules and Directives branch
 Division of Administrative Services
 Mailstop T 6 D 59
 U.S. Nuclear Regulatory Commission
 Washington, DC 20555-0001

Haddam Neck and Yankee Rowe Plant
 Comments on Draft Supplement to GEIS

Yankee Atomic Electric Company (YAEC) and Connecticut Yankee Atomic Power Company (CYAPCO) appreciate the opportunity to provide comments on the draft supplement 1 to NUREG-0586, "Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities".

In a letter dated April 25, 2001⁽¹⁾, CYAPCO submitted a response to a Nuclear Regulatory Commission (NRC) request for additional information to support development of the Generic Environmental Impact Statement (GEIS) supplement. Many of these comments were incorporated in the draft supplement. In general the draft supplement meets the goal of updating the GEIS to current decommissioning practices and dismantlement options. We have reviewed the draft supplement and offer specific comments contained in the attachment.

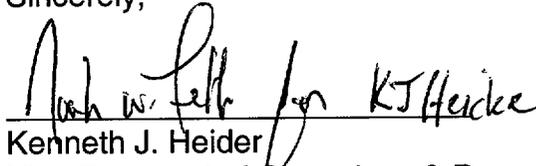
If you have any questions regarding this submittal, please contact Gerry van Noordennen at (860) 267-3938.

⁽¹⁾ CYAPCO letter CY-01-076 to U.S. Nuclear Regulatory Commission, "Response to NRC Request for Additional Information to Support GEIS Supplement", dated April 25, 2001.

Template - ADM-013

F-RFDS = ADM-03
 Add. = M. Masnik (MTM2)

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth J. Heider". The signature is written in a cursive style and is positioned above a horizontal line.

Kenneth J. Heider
Vice President of Operations & Decommissioning

cc: H. J. Miller, NRC Region I Administrator
J. E. Donoghue, Senior Project Manager, Haddam Neck Plant
R. R. Bellamy, Chief, Decommissioning and Laboratory Branch, NRC
Region I
Document Control Desk, U.S. Nuclear Regulatory Commission
D. C. Scalletti, U.S. Nuclear Regulatory Commission
Paul H. Genoa, Nuclear Energy Institute
E. L. Wilds, Jr., Director, CT DEP Monitoring and Radiation Division

YAEC & CYAPCO Comments on the draft supplement to the GEIS

1. The Figure 1-1, "Decommissioning Timeline" should also reflect the 60 year window, mentioned in 10CFR50.82(a)(3), that starts from the permanent cessation of operation.

2. Revise the first part of the last sentence on page 1-5 to read:

If a licensee chose to operate the ISFSI under a Part 50 license, they could choose to continue under the Part 50 license, or by way of license amendment request,

3. Delete the discussion of "Rubblization" on page 1-7 and delete the term "Rubblization" in the Glossary (Appendix M). Maine Yankee first utilized this term in a January 13, 2000 letter which served to submit their License Termination Plan (LTP). On June 1, 2001, Maine Yankee filed revision 1 to their LTP. On August 13, 2001, Maine Yankee filed revision 2 to their LTP. In their current LTP, Maine Yankee does not propose to use "Rubblization" and no longer utilizes the term. No licensee is currently pursuing the "Rubblization" concept as described in Maine Yankee's original LTP submittal.

The term which most accurately describes the approach which licensees are currently pursuing is "concrete backfill". Connecticut Yankee described the process as follows in section 4.3.1 of our LTP submitted on July 7, 2000:

Concrete from contaminated structures will be remediated to a level meeting the radiological criteria for unrestricted release of the site. After completion of final status surveys and absent any findings during NRC inspections, concrete building debris from decontaminated structures may be used as backfill and placed into the remaining subsurface building foundations.

4. Under the description of the Turbine building (on page 3-6) revise the last two sentences to read:

Primary coolant is not circulated through the turbine building systems in PWRs. However, it is not unusual for the turbine building to become mildly contaminated during power generation at PWRs.

5. Add the following sentence to the first paragraph in section 3.1.4:

Most of the contamination in the reactor coolant system is from the activation of corrosion products and not fuel.

6. Revise the second to last sentence on page 3-15 to read:

The entire structure (or portions) must be removed.....

7. The last sentence on page 3-15 is only true if corrosion products are included. The sentence should be revised to read:

If corrosion products are included, the radioactive decay.....

8. The last two paragraphs on page 3-15 need to be rewritten. The discussion of contamination and activation needs to be clarified. If requested, CYAPCO will work with the Commission to rewrite this text.
9. Yankee Rowe should be added to the list of plants mentioned in the second to last paragraph of page 3-26. The Yankee Nuclear Power Station was one of the plants in the AEC's Demonstration's Program. Yankee Rowe's license number is DPR-3.
10. The second to last paragraph on page 3-32 discusses the creation of nuclear islands. Nuclear islands are not primarily created because of security reasons. The real benefit in creating nuclear islands is to not interfere with spent fuel storage. The purpose for creating a nuclear island is to provide a facility for the safe long-term storage of spent fuel, which is independent of the remainder or the rest of the facility. The purpose of the modifications is to divorce the spent fuel cooling function from dependence on systems which must be dismantled as part of the overall decommissioning process.
11. Expand the discussion about Stage 4 of the decommissioning process. This discussion should contain as much description as the descriptions under stages 1 through 3.
12. Delete "groundwater" from the first sentence in section 4.3.3.4. Releases are not made to groundwater under NPDES permits. NPDES discharge points discharge to surface water locations.