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7:22 AM '01

Rules and Directives
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JAN 30 2002

1/28/01

66 FR 59518

(3)

Rules and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Gentlemen:

NUCLEAR REGULATORY COMMISSION (NRC) - COMMENTS ON DRAFT REGULATORY GUIDE AND DRAFT STANDARD REVIEW PLAN; ISSUANCE, AVAILABILITY (VOL. 66 FEDERAL REGISTER 59518, DATED NOVEMBER 28, 2001)

TVA appreciates NRC's effort to make information publicly available regarding the acceptable methods for meeting specific decommissioning regulations, techniques used by the staff in evaluating problems or postulated accidents, and data needed by the staff in its review of applications for permits and licenses. This effort is commendable in that publicly-available, clear and consistent guidance helps to make the regulatory process more open and predictable.

TVA has reviewed and endorses the comments provided by the Nuclear Energy Institute (NEI) to NRC by letter dated January 25, 2002.

Specifically, TVA would like to highlight two particular aspects of the NEI comments.

First, TVA agrees with the overall principle of clarifying the difference between those funds which are associated with NRC-required decommissioning costs and those costs associated with decommissioning activities which are not specified by NRC regulation. (In the referenced NEI letter, NEI refers to these as "non-NRC decommissioning costs.") This is important in that it reduces the potential for confusion by public stakeholders regarding the handling of these funds and lays the groundwork for appropriate flexibility in managing and accessing these funds (e.g., allowing use of the same account for management of both categories of funds in order to reduce administrative costs for fund management).

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Second, TVA agrees with NEI that a site-specific estimate represents a detailed analysis which should be acceptable even if it justifies a funding level that is lower (not just higher as currently worded) than the funding level calculated in the formula in 10 CFR 50.75(c).

TVA appreciates the opportunity to comment on these draft guidance documents. If you have questions, please contact me at (423) 751-2508.

Sincerely,



Mark U. Burzynski
Manager
Nuclear Licensing

cc: U.S. Nuclear Regulatory Commission
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