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Chief, Rules Review and Directives Branch
U. S. Nuclear Regulatory Commission
Mail Stop T-6-D59
Washington, D C 20555-0001

Comments on NUREG-1757, Supplement 1, "Consolidated Nuclear Material Safety and Safeguards (NMMS) Decommissioning Guidance: Updates to Implement the License Termination Rule Analysis, Draft Report for Comments" (70 FR 56,940 – September 29, 2005)

Connecticut Yankee Atomic Power Company (CYAPCO) appreciates the opportunity to provide comments to the U. S. Nuclear Regulatory Commission (NRC) in response to the subject notice. NUREG-1757, Draft Supplement 1 proposes changes that should provide some regulatory relief for future decommissioning work. Some of the important changes include:

1. Allow reasonable scenarios (versus the worst case scenarios that have been generally used to date),
2. Allowing intentional mixing of contaminated soil, and
3. Allow future land use assumptions to be based on a 100 year versus a 1000 year horizon.

CYAPCO is supportive of the above changes, as these changes should make dose modeling and remediation more reasonable in the future while continuing to protect the safety of the public. In addition, the NRC recommends the use of the Multi-Agency Radiological Laboratory Analytical Protocols (MARLAP, 2004) as part of decommissioning planning. The MARLAP describes a methodology for planning, conducting, evaluating, and documenting environmental radiation surveys conducted to demonstrate compliance with cleanup criteria. The NRC is also recommending that the MARLAP should be used in concert with the Multi-agency Radiation Survey and Site Investigation Manual (MARSSIM, 2000) as part of the Data Quality Objectives process in performing final status and

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potentially other surveys as part of the remediation and the Final Status Survey process. However, it is not clear that the NRC will require the existing plant sites which are undergoing decommissioning to follow the above recommendation (i.e., use of the MARLAP). CYAPCO recommends some flexibility in the required application of the MARLAP for plant sites which are currently in the advanced stage of decommissioning and cleanup activities.

Should you have any questions regarding our comments, please do not hesitate to contact me at (860) 267-3938.

Sincerely,

Gerard van Noordennen

Gerard P. van Noordennen
Regulatory Affairs Manager

12-22-05

Date