

Rulemaking Comments

From: George_Bieberbach@fpl.com
Sent: Wednesday, August 27, 2008 3:01 PM
To: Rulemaking Comments
Cc: george_bieberbach@fpl.com
Subject: Draft Changes to 10CFR72
Attachments: NP-ISFSI-08-228.pdf

DOCKETED
USNRC

August 28, 2008 (12:30pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Dear Sir,

Please find attached our letter with comments on the subject document.
Please provide receipt confirmation of this email.
Thank you for your assistance.

(See attached file: NP-ISFSI-08-228.pdf)

George Bieberbach
Florida Power and Light
Juno Beach Florida

Received: from mail1.nrc.gov (148.184.176.41) by OWMS01.nrc.gov
(148.184.100.43) with Microsoft SMTP Server id 8.0.751.0; Wed, 27 Aug 2008
14:56:52 -0400

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X-SBRS: 6.3

X-MID: 29493487

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X-IronPort-Anti-Spam-Result:

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d="pdf?scan'208,217";a="29493487"

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Received: from goxnh03.fplu.fpl.com ([155.109.192.100]) by
mail3.fpl.com (Lotus Domino Release 6.5.6FP2) with ESMTP id
2008082714580042-126898 ; Wed, 27 Aug 2008 14:58:00 -0400

From: <George_Bieberbach@fpl.com>

Subject: Draft Changes to 10CFR72

To: Rulemaking.Comments@nrc.gov

CC: george_bieberbach@fpl.com

X-Mailer: Lotus Notes Release 5.0.10 March 22, 2002

Message-ID:

<OF4D08BBFE.58608BE2-ON852574B2.00680D53-852574B2.006811AC@fplu.fpl.com>

Sender: <George_Bieberbach@fpl.com>

Date: Wed, 27 Aug 2008 15:00:48 -0400

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at

08/27/2008 02:56:46 PM,

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08/27/2008 02:58:00 PM,

Serialize by Router on MAIL3/fplrelay(Release 6.5.6FP2|October 17, 2007) at

08/27/2008 02:58:04 PM

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Return-Path: George_Bieberbach@fpl.com



P.O. Box 14000, Juno Beach, FL 33408-0420

Letter No. NP-ISFSI-08-228

August 27, 2008

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Secretary, US Nuclear Regulatory Commission
Washington, DC 20555-0001

Response Required: No

Attention: Rulemakings and Adjudications Staff

Subject: Florida Power and Light Comments to Preliminary Draft Changes to 10CFR72

Reference: Part 72 License and Certificate of Compliance Terms, Preliminary Draft Language (July 2008)

Dear Sir,

FPL has reviewed the subject document and provides comments as shown in the attachment to this letter. Should you have any questions, please contact me at 561-691-7457

Sincerely,

A handwritten signature in black ink that reads 'Gary Hollinger'. The signature is written in a cursive, flowing style.

Gary Hollinger
ISFSI Project Manager

Attachment: Comments to NRC Proposed Changes to 10CFR72

AF/gb/rd

Cc: Alan Fata
Charles Gears
Rene Dieter

George Bieberbach
Andy Zielonka

George Circosta
John Donahoe

Comments to NRC Proposed Changes to 10CFR72

72.3 Definitions

Comments: None

72.24 Contents of Application: Technical Information

Comments: Since the applications are, in many cases, already issued and approved, NRC expectations/requirements for aging analysis and aging management programs for already approved applications should be provided so licensees know what is required to be done and when it must be done.

72.42 Duration of License: renewal

Comments: Same comment as stated for paragraph 72.24

72.212 Conditions of general license issued under 72.210

Comments: The change to the wording that ties the termination of the general license to the termination of the CoC, versus a specific number of years from initial use, shortens the usable duration of the license even if the casks are not used for some time. This results in a diminishing return for casks ordered later in the CoC term. The termination should be tied to the actual use date or equivalent tie so that the general licensee gains full 40 year use of the CoC.

72.230 Procedures for spent fuel storage cask submittals

Comments: None

72.236 Specific requirements for the spent fuel storage cask approval and fabrication

Comments: Same comment as stated for paragraph 72.42 above

72.238 Issuance of an NRC Certificate of Compliance

Comments: Same comment as stated for paragraph 72.42 above

72.240 Conditions for spent fuel storage cask renewal

Comments: None