

Stephen B. Bram
Vice President

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Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, NY 10511
Telephone (914) 734-5340

USNRC
OFFICE OF ADMINISTRATIVE
February 15, 1994

Re: Indian Point Unit No. 2
Docket No. 50-247

Mr. David L. Meyer, Chief
Rules Review and Directives Branch
Division of Freedom of Information
and Publication Services
US Nuclear Regulatory Commission
Washington, DC 20555

G. Menemsky

58 FR 54385

10/24/93

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SUBJECT: Request for comments on the USNRC draft
NUREG/CR-5884, "Revised Analysis of
Decommissioning for the Reference Pressurized
Water Reactor Power Station" and draft
NUREG/CR-6054, "Estimating Pressurized Water
Reactor Decommissioning Costs"

In response to your request for comments on the subject
matter, as reflected in 58 FR 54385, dated October 21, 1993,
we offer the following:

The cost estimation basis needs further clarification.
For example, in the draft report reference is made to
10 CFR 961 Appendix E as requiring spent nuclear fuel
(SNF) to be cooled in the reactor pools for at least
five years before it can be placed into dry storage.
This is technically incorrect as the regulation only
states that the minimum cooling time for fuel is five
years and does not specify where it should be cooled.
Thus, for compliance, some latitude is provided which
should lead to an evaluation of various scenario's with
concomitant cost impacts. Although the choice of spent
fuel pool cooling for the required duration may be the
most cost effective, the NUREG fails to provide
information supporting this.

Also, the draft report provides only a brief
qualitative assessment of the cost impact to the
decommissioning alternatives for a multiple reactor
site, based on an 1982/1983 study performed by the NRC
(NUREG/CR-1755), and alludes to potential savings under
this scenario. As we are a multiple reactor site, and
recognizing that this draft NUREG will form the basis
for reassessment of costs associated with the
decommissioning of a facility as currently reflected in
10 CFR 50.75, we believe that more than just a cursory
mention is warranted. Rather, whether separately or
integral with this report, a more comprehensive
assessment of this scenario should be conducted and
included in this reassessment effort.

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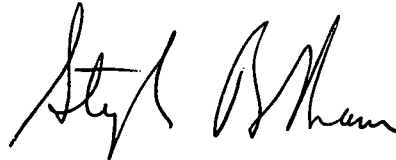
Additionally, we support the position of NUMARC with regard to their identification of difficulties experienced by the industry in the implementation of the current rule and the stated necessary improvements to the draft NUREG/CR-5884 to achieve a more valid model for decommissioning cost estimates.

Also, as noted in NUMARC's response, we are equally concerned that this effort should not result in decommissioning funding requirements for spent nuclear fuel beyond those needed for license termination. As you are aware, we have been contributing separately to a trust fund for disposal of spent fuel as mandated by the Nuclear Waste Policy Act of 1988. It would be unconscionable for our customers to pay twice for this requirement.

Finally, Con Edison agrees with NUMARC that a unit-specific, detailed cost analysis of decommissioning should be the basis for seeking a permissible exemption from generic funding requirements based solely on reference plant estimates.

We request that the Nuclear Regulatory Commission (NRC) consider the concerns identified above in updating the draft NUREG/CR-5884. These comments will clearly benefit the objective of ensuring that at the time of permanent cessation of operations of a nuclear facility sufficient funds are available to decommission the facility in a manner that protects public health and safety.

Very truly yours,



cc: Document Control Desk
US Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555

Mr. Thomas T. Martin
Regional Administrator - Region I
US Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. Francis J. Williams, Jr., Project Manager
Project Directorate I-1
Division of Reactor Projects I/II
US Nuclear Regulatory Commission
Mail Stop 14B-2
Washington, DC 20555

Senior Resident Inspector
US Nuclear Regulatory Commission
PO Box 38
Buchanan, NY 10511