



CONNECTICUT YANKEE ATOMIC POWER COMPANY

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DOCKETED  
USNRC

HADDAM NECK PLANT

362 INJUN HOLLOW ROAD EAST HAMPTON, CT 06424-3099

June 28, 2012 (2:50 pm)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

June 18, 2012  
CY-12-038

Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Attention: Rulemakings and Adjudications Staff

Subject: CY Comments on NRC's Advance Notice of Proposed Rulemaking (ANPR) – Onsite  
Emergency Response Capabilities: 10 CFR Parts 50 and 52

References:

- (a) Advance Notice of Proposed Rulemaking (ANPR) – Onsite Emergency Response  
Capabilities: 10 CFR Parts 50 and 52 (Docket ID NRC-2012-0031)
- (b) License No. DPR-61 (Docket No 50-213, 72-39) (Connecticut Yankee)
- (c) Decommissioning Plant Coalition letter to the US NRC Regarding NRC's Advance Notice of  
Proposed Rulemaking (ANPR) – Onsite Emergency Response Capabilities (June 18, 2012)

Connecticut Yankee Atomic Power Company (CY) appreciates the opportunity submit  
comments regarding the NRC's Advance Notice of Proposed Rulemaking: "Onsite Emergency  
Response Capabilities" (Reference (a)) whereby the NRC is proposing to amend its regulations to  
strengthen and integrate onsite emergency response capabilities.

CY supports the position provided in the Decommissioning Plant Coalition (DPC) comment  
letter (reference (c)) that this ANPR and subsequent rulemaking is not applicable to 10 CFR Part  
50 Licensees that only operate an Independent Spent Fuel Storage Installation (ISFSI) at the  
former reactor site. Since the CY ISFSI facility does not have an operating reactor and the  
power plant has been completely decommissioned, this proposed rulemaking would not apply  
this 10 CFR Part 50 licensee and the associated facility.

Accordingly, CY urges the Commission to include a specific statement in the future development  
of this rulemaking that clearly delineates that this rulemaking does not apply to holders of an  
operating license under 10 CFR Part 50 that have permanently ceased operation, certified that  
fuel has been permanently removed from the reactor vessel under 10 CFR Part 50.82, and have  
completed decommissioning of the power plant and only operate an ISFSI.

Sincerely,

  
Jim Lenois  
CY ISFSI Manager

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