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Nuclear Licensing and
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TO:

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(JAS15)

Dominion Resources Services, Inc.
Innsbrook Technical Center
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November 15, 2012

Ms. Cindy K. Bladey
Chief, Rules, Announcements, and Directives Branch
Office of Administration
Mail Stop: TWB-05-B01M
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

COMMENTS ON REVISION 16 OF NUREG-1307,
"REPORT ON WASTE BURIAL CHARGES:
CHANGES IN DECOMMISSIONING WASTE DISPOSAL
COSTS AT LOW-LEVEL WASTE BURIAL FACILITIES"
(DOCKET ID: NRC-2010-0362)

The purpose of this letter is for Dominion Resources Services, Inc. (Dominion) to endorse the comments submitted by the Nuclear Energy Institute (NEI) on November 15, 2012. Specifically, Dominion disagrees with the misapplication of Industry Low Level Radwaste (LLRW) volume data to justify the NRC's perception that licensee decommissioning funds are insufficient to accomplish timely license termination.

Additionally, as also detailed in the NEI comments, Dominion is troubled by both the lack of proper administrative process and public openness offered during the NUREG-1307 revision process.

If you have any questions or would like further information on our comments, please contact me at 804/273-2229.

Respectfully,


Leslie N. Hartz, Vice President
Nuclear Support Services