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9/21/2012

77 FR 58591

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November 15, 2012

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

Subject: Comments Concerning Draft Revision 15 of NUREG-1307, "Report on Waste Burial Charges: Changes in Decommissioning Waste Disposal Costs at Low-Level Waste Burial Facilities" (77FR64361, dated October 19, 2012, Docket ID: NRC-2010-0362)

This letter is being submitted in response to the U.S. Nuclear Regulatory Commission (NRC) request for comments concerning draft Revision 15 of NUREG-1307, "Report on Waste Burial Charges: Changes in Decommissioning Waste Disposal Costs at Low-Level Waste Burial Facilities," published in the *Federal Register* (i.e., 77FR64361, dated October 19, 2012).

The U.S. Nuclear Regulatory Commission (NRC) requires nuclear power reactor licensees to adjust annually the estimate of the cost of decommissioning their plants, in dollars of the current year, as part of the process for providing reasonable assurance that adequate funds for decommissioning will be available when needed. This report, which is revised periodically, determines waste burial escalation factors acceptable to the NRC for calculating the minimum decommissioning fund requirements for nuclear power plants. The next reports are due by March 31, 2013, to cover funding assurance as of the end of this year (2012). The draft of Revision 15 includes a reassessment of low-level waste disposal costs, and specifically a change to the assumed destination (and hence rate applied) to a large portion of the waste disposed during decommissioning (direct versus vendor disposal options).

Exelon Generation Company, LLC (Exelon) appreciates the opportunity to comment on this draft report. Exelon fully supports and endorses the comments submitted by the Nuclear Energy Institute (NEI) on behalf of the industry in its letter dated November 15, 2012, regarding this subject. Specifically, Exelon agrees that the proposed changes to the vendor disposal option do not accurately reflect the economic realities of decommissioning and is not consistent with the data in the Exelon site-specific cost estimates used to support the change. The NEI comments include updated calculations for the breakdown of waste streams for the Exelon sites and how the cost information available to the NRC should be used for this calculation. Exelon has reviewed and agrees with the Exelon-specific information in the NEI response.

SUNSI Review Complete

Template = ADM-013

E-RIDS = ADM 03

Contact: J.A. Simpson (jas15)

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If you have any questions or require additional information, please do not hesitate to contact Richard Gropp at (610) 765-5557.

Respectfully,

A handwritten signature in black ink, appearing to read "Michael D. Jesse", with a stylized flourish at the end.

Michael D. Jesse
Director, Licensing and Regulatory Affairs
Exelon Generation Company, LLC