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February 21, 2014

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RULES AND DIRECTIVES BRANCH

Cindy Bladey,
Chief, Rules, Announcements, and Directives Branch,
Office of Administration,
Mail Stop: 3WFN-06-A44M,
U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001

RE: Docket ID NRC-2013-0283 (Comments for Crystal River PSDAR)

Dear Ms. Bladey:

Our office has reviewed the Crystal River PSDAR submittal referenced in the above docket and offers the following comments:

1. During the 1/9/14 public meeting, the decommissioning staff indicated that large components would remain on-site until decommissioning begins (Phase 4), yet the PSDAR indicates that large components will be dispositioned in period 1 (see Section 2.1.1, bullet 7) Pg. 7.

2. The PSDAR (see Table 4) implies that no escalation charges are applicable to Decommissioning cost accrual over the SAFSTOR time period. This assumption may be inconsistent with both real world experience and NRC guidance; (NUREG 1307, Rev. 15, "Report on Waste Burial Charges". Pg. 21).

3. The PSDAR does not address means of securing the damaged containment, or provide means for ensuring it's (containment) adequacy for;

    a. Long term containment during fuel offload and dormancy period, and

    b. Physical security of materials inside the containment.

4. The PSDAR indicates that underground piping will be removed during decommissioning. Considering the escalating risk of unused and or semi-abandoned pipes breaching during the long dormancy period, this potential risk of increased environmental impact may not be adequately addressed as a contingency in the decommissioning cost model.

5. In consideration of Fuel Transfer from the spent fuel storage pad (ISFSI) to the DOE in 2036 whereas decommissioning activities occur after 2067 (to include the removal, packaging and long term storage of greater than class C (GTCC) materials), the PSDAR does not contemplate how will this material (GTCC) be handled. The ISFSI facility will not likely remain commissioned following fuel removal in 2036 and GTCC material removed from the Reactor Vessel Internals may still be orphaned. The PSDAR should resolve this potential

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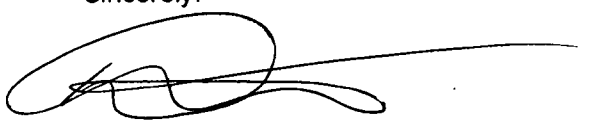
Add= O. Gratton (OKG1)

inconsistency and or reschedule the activity of characterization, removal and packaging to coincide with the transfer of fuel to the ISFSI.

6. Prior to the disassociation of the operating staff of the facility, and during the Preparatory Period, an interim Historical Site Assessment and Radiological Characterization should be performed to enable "critical technical and organizational knowledge" to be preserved. This will assure capture of important information that would otherwise be lost as the original work force becomes disassociated with the facility.

We appreciate the opportunity to offer our comments,

Sincerely.



David A. Wise, CHMM