

# PUBLIC SUBMISSION

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**Docket:** NRC-2014-0255

Review of Security Exemptions/License Amendment Requests for Decommissioning Nuclear Power Plants

**Comment On:** NRC-2014-0255-0001

Review of Security Exemptions/License Amendment Requests for Decommissioning Nuclear Power Plants;  
Draft Interim Staff Guidance for Comment

**Document:** NRC-2014-0255-DRAFT-0002

Comment on FR Doc # 2014-28418

79 FR 71458

12/2/2014

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## Submitter Information

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**Name:** Daniel Shrum

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## General Comment

Please see the attached comments from EnergySolutions LLC.  
Sent on behalf of

Daniel B. Shrum  
Senior Vice President  
Regulatory Affairs

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## Attachments

CD15-0004 01-08-15 EnergySolutions LLC, Comments on Review of Security Exemptions-License Amendment Requests for Decommissioning Nuclear Power Plants

SUNSI Review Complete  
Template = ADM - 013  
E-RIDS= ADM-03  
Add= D. Garner (OLG3)  
M. Cervera (msc3)



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# ENERGYSOLUTIONS

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January 8, 2015

CD15-0004

Secretary  
US Nuclear Regulatory Commission  
ATTN: Rulemakings and Adjudications Staff  
Washington, DC 20555-0001

Subject: Comments on Review of Security Exemptions/License Amendment Requests for Decommissioning Nuclear Power Plants

Reference: Docket ID NRC-2014-0255

Dear Ms. Vietti-Cook:

*EnergySolutions* hereby provides comments in response to the NRC request for public comments on its draft Interim Staff Guidance (ISG) NSIR/DSP-ISG-03, "Review of Security Exemptions / License Amendment Requests for Decommissioning Nuclear Power Plants."

In general, *EnergySolutions* is in agreement with the draft ISG, but we recommend that the ISG address the transition of nuclear power plant security programs from Part 73 to Part 37. Nuclear power plants that are being decommissioned typically petition for a rescission of spent fuel security orders after all spent fuel has been moved to the ISFSI to allow them to eliminate a Part 73-based security program for portions of the site other than the ISFSI. Licensees can reduce the requirements of their security program by maintaining a Part 37-based security program that better aligns with the radiological risk associated with ongoing activities. *EnergySolutions* recommends that the NRC include guidance in the ISG to inform NRC reviewers that the Part 73 physical security in place for spent fuel is sufficient for the site, and as the sites security requirements are reduced, a transition from Part 73 to Part 37 can be undertaken to reduce the burden of unnecessary controls.

Additionally, in the background checks performed for access authorization, the ISG should recognize that in those situations where both Part 37 and Part 73 programs are in place, the background investigation period for access authorization required under Part 73 (3 years) is sufficient and the more extensive period (7 years) required by Part 37.25(a) is not necessary.

We appreciate the opportunity to provide comments. Questions may be directed to me at (801) 649-2109 or [dshrum@energysolutions.com](mailto:dshrum@energysolutions.com).

Sincerely,



Daniel B. Shrum  
Senior Vice President  
Regulatory Affairs