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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-0003

Comment on FR Doc # 2014-28418

79 FR 71458

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②

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General Comment

Comments attached

Attachments

01-08-15_NRC_Industry Comments on NSIR-DSP-ISG-03

01-08-15_NRC_Industry Comments on NSIR-DSP-ISG-03_Attachment

SUNSI Review Complete

Template = ADM - 013

E-RIDS = ADM-03

Add = D. Garner (OLG3)

M. Cervera (MSC3)

DAVID R. KLINE
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January 8, 2015

Ms. Cindy K. Bladey
Office of Administration
Division of Security Policy
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry comments on NSIR/DSP-ISG-03 Interim Staff Guidance: Review of Security Exemptions/License Amendment Requests for Decommissioning Nuclear Power Plants (*Federal Register Vol. 79, 71458*, dated December 2, 2014 – Docket ID NRC-2014-0255)

Project Number: 689

Dear Ms. Bladey:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)¹ appreciates the opportunity to provide comments on the NSIR/DSP-ISG-03 Interim Staff Guidance; "Review of Security Exemptions/License Amendment Requests for Decommissioning Nuclear Power Plants."

The purpose of this Interim Staff Guidance (ISG) is to provide guidance to U.S. Nuclear Regulatory Commission (NRC) staff on conducting technical reviews of a licensee's request for license amendments, alternative measures, and requests for exemption of security regulations for nuclear power reactors that are undergoing the process of decommissioning. Our overarching concern with the ISG is its inconsistency when addressing a modification to a licensee's security plan. The ISG discusses potential changes to the security plan during the initial transition period and dry cask storage (ISFSI), but is silent on the wet storage phase. We believe changes could be made during the wet storage phase and the ISG provides no apparent justification to the contrary.

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

Ms. Cindy K. Bladey

January 8, 2015

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Attached are comments and recommended changes that have been provided by industry stakeholders following their review of the ISG. We appreciate your consideration of these comments. If you have any questions or require additional information, please contact Anthony J. Clore at (202) 739-8025; ajc@nei.org or me.

Sincerely,

A handwritten signature in black ink, appearing to read "David R. Kline". The signature is written in a cursive, somewhat stylized font.

David R. Kline

Attachment

c: Ms. Christiana H. Lui, NSIR/DSP, NRC
Ms. Sandi L. Wastler, NSIR/DSP/MWSB, NRC
Mr. Gary W. Purdy, NSIR/DSP/MWSB, NRC
NRC Document Control Desk

NSIR/DSP-ISG-03 Industry Comments

Section	Proposed Wording	Proposed Change/Edits
Section 4.0, page 5, paragraph 4	Remove the sentence...The designation of being in the process of decommissioning does not automatically allow all changes to be determined as not decreasing this effectiveness.	Add...The effectiveness of the security plan should be determined commensurate with the risk of harm to the health and safety of the public
Section 5.1.1, paragraph 2, item 6, page 8	Remove this sentence	Add...Reduction in overall security staffing based on site specific protective strategies.
Section 5.1.2, paragraph 1		Add...The security requirements or protective strategy for a facility that has transferred its spent fuel to wet storage has the potential to be modified without a reduction in the overall effectiveness of the security plans.
General Comment		Risk acknowledgment should be considered in all three phases of decommissioning. This should be taken into effect when licensees are submitting security plan changes.