



CONNECTICUT YANKEE ATOMIC POWER COMPANY

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HADDAM NECK PLANT

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June 3, 2015  
CY-15-024

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Ms. Cindy Bladey, Office of Administration,  
Mail Stop: OWFN-12-H08,  
U.S. Nuclear Regulatory Commission,  
Washington, DC 20555

Connecticut Yankee Atomic Power Company  
Haddam Neck Plant Independent Spent Fuel Storage Installation  
NRC License No. DPR-61 (NRC Docket Nos. 50-213 and 72-39)

**Subject:** Comments on Proposed Draft Regulatory Guide DG-5057, "Special Nuclear Material Control and Accounting System for Non-Fuel Cycle Facilities," Proposed Revision 3 of Regulatory Guide 5.29, dated June 2013 [Docket ID NRC-2015-0120]

Connecticut Yankee Atomic Power Company (CYAPCO) appreciates the opportunity to provide comments on the proposed Draft Regulatory Guide DG-5057, "Special Nuclear Material Control and Accounting System for Non-Fuel Cycle Facilities." CYAPCO is a 10 CFR Part 50 Licensee that operated a single unit nuclear power plant that is now permanently shut down and decommissioned. All that remains at the site is an Independent Spent Fuel Storage Installation (ISFSI) that utilizes a 10 CFR Part 72 licensed dual-purpose dry cask storage system. All Special Nuclear Material (SNM) is stored within the dry cask storage system and is in a static storage condition.

CYAPCO is concerned that the NRC did not address or include guidance specific to stand-alone ISFSI sites that have completed decommissioning within the proposed Draft Regulatory Guide DG-5057, "Special Nuclear Material Control and Accounting System for Non-Fuel Cycle Facilities." CYAPCO believes that the guidance should be enhanced to acknowledge the existence of stand-alone ISFSIs that have completed decommissioning of the nuclear plant, and define compliance options specific to those licensees.

In addition, CYAPCO previously supplied comments regarding the proposed rulemaking on March 10, 2014. CYAPCO does not believe the NRC provided a sufficient safety basis, data or analysis to justify the fundamental restructuring of the current Material Control and Accounting practices for a stand-alone ISFSI. Given the low risks associated with spent fuel stored in dry canisters at stand-alone ISFSI sites, CYAPCO believes that the NRC should utilize a risk-informed approach regarding stand-alone ISFSIs in the revised rule and the associated guidance document.

SUNSI Review Complete  
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If you have any questions regarding this submittal, please do not hesitate to contact me at  
(860) 267-6426 ext. 303.

Respectfully,

A handwritten signature in black ink, appearing to read 'Brantley Buerger', with a horizontal line extending to the right.

Brantley Buerger, P.E.  
ISFSI Manager

cc: D. H. Dorman, NRC Region I Administrator  
M. S. Ferdas, Chief, Decommissioning Branch, NRC, Region I  
J. Goshen, NRC Project Manager