



YANKEE ATOMIC ELECTRIC COMPANY
49 Yankee Road, Rowe, Massachusetts 01367

June 16, 2015
BYR 2015-022

Ms. Annette L. Vietti-Cook, Secretary
Attn: Rulemaking and Adjudications Staff
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Yankee Atomic Electric Company
Yankee Nuclear Power Station Independent Spent Fuel Storage Installation
NRC License Nos. DPR-3 and SFGL-13 (NRC Docket Nos. 50-029 and 72-31)

Subject: Comments on the NRC Advance Notice for Proposed Rulemaking for 10 CFR 20, "Radiation Protection" (Federal Register Vol. 79, 143), dated July 25, 2014 - Docket ID NRC-2009-0279

On July 25, 2014 an Advanced Notice for Proposed Rulemaking (ANPR) was published in Federal Register Notice (79 Fed. Reg. 143) docketed (Docket ID NRC-2009-0279) to revise the Nuclear Regulatory Commission's regulations in 10 CFR 20, "Radiation Protection," and requested comments by November 24, 2014. The deadline for submitting comments was extended to March 24, 2015, and subsequently to June 22, 2015.

Yankee Atomic Electric Company (YAEC) endorses the Nuclear Energy Institute's (NEI) letter that will be submitted on behalf of the nuclear energy industry and recommends that the NRC not make the changes proposed in the ANPR because they are unnecessary with no cost-benefit, providing little to no improvement in the health and safety of workers, public or the environment. NEI submitted the referenced letter on March 24, 2015.

YAEC concurs with the NRC's position as stated in the NRC SRM-SECY-08-0197 that current standards continue to provide adequate protection of the health and safety of workers, the public and the environment.

YAEC also concurs with the NRC that the recommendations contained in ICRP Publication 103 (2007) proposes measures that go beyond what is needed to provide adequate protection.

YAEC believes that the nuclear industry's current operating practices protect workers, the public and the environment far beyond regulatory requirements for the nuclear energy industry.

Furthermore, YAEC believes that the cumulative effect of regulation (CER) resulting from the changes described in the ANPR for 10 CFR Part 20 will place substantial resource burdens on nuclear energy licensees with little or no additional protection of occupational workers or the public. This burden will be further compounded should the potential changes proposed by the

U.S. Environmental Protection Agency in the February 2, 2014 ANPR for 40 CFR Part 190 and the changes proposed in the anticipated publication of the ANPR for Part 50, Appendix I be imposed on licensees.

In summary, YAEC recommends that no changes be made to the existing regulations because (1) existing standards remain protective of occupational workers, public health as well as the environment; (2) the recommendations contained in ICRP Publication 103 propose measures that go beyond what is needed to provide adequate protection; (3) the nuclear industry's current operating procedures and practices protect occupational workers, the public and the environment far beyond the regulatory requirements for the uranium fuel cycle; (4) changing regulations would place significant human and monetary resource burdens on licensees and; (5) there will be a significant cumulative effect of regulation, together with proposed changes to U.S. EPA's 40 CFR Part 190 and NRC's 10 CFR Part 50 Appendix I, on the industry with little or no benefit to worker and public health safety, and the environment.

If there are any questions, or if additional information is required, please contact me at (413) 424-5261 extension 303.

Respectfully,



Brian E. Smith
ISFSI Manager

cc: Mr. Daniel Dorman, NRC Region I Administrator
Mr. Mark S. Ferdas, Chief, Decommissioning Branch, NRC, Region I
Mr. John Goshen, NRC Project Manager
Ms. Laura A. Dudes, Director, Division of Material Safety, State, Tribal and Rulemaking Programs, Office of Nuclear Material Safety and Safeguards