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November 30, 2015

Mr. Scott Morris
Director, Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Draft Guidance NEI 15-06 "Use of Nuclear Decommissioning Trust Fund"

Project Number: 689

Dear Mr. Morris:

Attached for NRC consideration and information is the revised draft industry guidance NEI 15-06 "Use of Nuclear Decommissioning Trust Fund" to support appropriate decision-making regarding use of the Nuclear Decommissioning Trust Fund. The guidance incorporates lessons learned from recent licensee fund usage and the public meeting held on August 25, 2015. It provides decision-making criteria in the form of a logic tree built on the regulations and existing guidance that govern fund use. We request that NRC review this guidance and consider it for potential staff endorsement.

Endorsed industry guidance in this area will enable licensees to make decisions regarding the use of the Nuclear Decommissioning Trust Fund to safely and efficiently decommission permanently shut down plants in an appropriate and consistent manner, while still taking into account site specific factors. We also request that NRC hold a public meeting in December to facilitate discussion of this guidance with staff and other stakeholders so that we may answer any questions in support of timely endorsement.

The industry appreciates the opportunity to work cooperatively with the NRC in developing guidance for the appropriate use of nuclear decommissioning trust funds. If you or your staff has questions in regard to the draft guidance, please do not hesitate to contact me.

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Sincerely,

A handwritten signature in black ink, appearing to read "Rodney McCullum". The signature is stylized and somewhat cursive, with the first name "Rodney" being more prominent than the last name "McCullum".

Rodney McCullum

Attachment

c: Antony Bowers, NRR/DIRS/IFAIB, NRC
Allen Howe, NRR/DIRS, NRC