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November 30, 2015

Ms. Meena Khanna
Chief-Decommissioning Transition Branch
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Submittal of NEI 15-04 "Guidelines for a Certified Fuel Handler Training and Retraining Program" and NEI 15-08 "Managing Personnel Fatigue at Decommissioning Reactors"

Project Number: 689

Dear Ms. Khanna:

In SECY-15-0014, dated January 30, 2015, the NRC staff provided information about the anticipated schedule and estimated resources for rulemaking addressing decommissioning¹. Industry supports an integrated rulemaking that would address the transition from operating to decommissioned status. However, lessons learned from the five most recently shutdown commercial power reactors coupled with the recent announcements indicating that additional plants will permanently close in the next five years indicates that action needs to be taken to enhance the stability and predictability of NRC's regulatory framework well in advance of NRC's anticipated schedule for completing this rulemaking in the 2019-2020 timeframe.

The industry is working with the NRC staff on two fronts to address this concern. First, the industry will be submitting a proposal, in response to NRC's Advanced Notice of Proposed Rulemaking that will seek to expedite consideration of certain rule changes that are especially relevant during the transition from operating to decommissioned status. Second, the industry is developing guidance documents and templates to assure consistency and efficiency in the near-term for activities impacting plants entering the decommissioning process until necessary rule changes can be promulgated.

The purpose of this letter is to support the second, interim, objective by submitting two guidance documents, NEI 15-04 "Guidelines for a Certified Fuel Handler Training and Retraining Program" (Attachment 1) and NEI 15-08 "Managing Personnel Fatigue at Decommissioning Reactors" to the NRC

¹ The NRC staff prepared SECY-15-0014 in response to Staff Requirements – SECY-14-0066 – Request by Dominion Energy/Keweenaw, Inc. For Exemptions from Certain Emergency Planning Requirements, Aug. 7, 2014 (SRM-SECY-14-0066); and Staff Requirements – SECY-14-0118 – Request by Duke Energy Florida, Inc. For Exemptions From Certain Emergency Planning Requirements, Dec. 30, 2014 (SRM-SECY-14-0118).

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(Attachment 2). We request the staff's timely review and consideration for endorsement of these guidance documents as acceptable approaches in lieu of exemptions and in advance of proposed rulemaking. If staff believes that it would be beneficial to the progress of this review to conduct a public meeting to discuss these documents, industry would be pleased to support such a meeting at your earliest convenience.

Sincerely,

A handwritten signature in cursive script that reads "Mark A. Richter".

Mark A. Richter

Attachments

c: Mr. Michael R. Johnson, EDO, NRC
Mr. William M. Dean, NRR, NRC
Ms. Michele G. Evans, NRR, NRC
Mr. George A. Wilson Jr., NRR/DORL, NRC
Mr. Lawrence E. Kokajko, NRR/DPR, NRC
Mr. Aby S. Mohseni, NRR/DPR, NRC
NRC Document Control Desk