

Rulemaking1CEm Resource

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To: Rulemaking1CEm Resource
Subject: FW: Comments on Proposed Rule "Regulatory Improvements for Decommissioning Power Reactors"

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TITLE: Regulatory Improvements for Decommissioning Power Reactors

COMMENT#: 013

From: jbyrne4424@comcast.net [mailto:jbyrne4424@comcast.net]

Sent: Tuesday, December 22, 2015 11:11 AM

To: RulemakingComments Resource <RulemakingComments.Resource@nrc.gov>

Subject: [External_Sender] Comments on Proposed Rule "Regulatory Improvements for Decommissioning Power Reactors"

I have read the Proposed Rule "Regulatory Improvements for Decommissioning Power Reactors" and offer the following comments

1. The rule basically covers reactors in decommissioning with fuel on site. There exist some reactors that have shipped their fuel (e.g Fermi 1, NS Savannah, TMI-2). Further in the future the DOE will start accepting fuel and sites will transition to no fuel on site status while still in SAFSTOR. I recommend that the rule note which requirements no longer apply when the fuel has been removed from site.
2. There exist sites that have both operating and non-operating reactors (e.g. Fermi 1, TMI-2, Millstone 1, Dresden 1, Indian Point 1 and Peach Bottom 1). This situation should be addressed in the discussions on Control Rooms, Staffing, and Certified Fuel Handlers, for instance alarms could be remoted to the operating control room and leave the shutdown plant control room unmanned.
3. I am not an expert on Inservice Inspections required by 50.55a but I would think that except when there is fuel in the Spent Fuel Pool none of the ISI provisions apply and the NRC can use words similar to those in 50.44 and 50.46 "except for those facilities for which the certifications required under § 50.82(a)(1) have been submitted" to remove any question on the applicability of these requirements
4. I recommend that the phrase "except for those facilities for which the certifications required under § 50.82(a)(1) have been submitted" should also be added to 50.46a "Acceptance criteria for reactor coolant system venting systems"

5. The proposed rule should also address the applicability of the General Design Criteria (10CFR50 Appendix A) and other Part 50 Appendices.

Thank You

Jim Byrne

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