

Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Monday, January 04, 2016 11:35 AM
To: Rulemaking1CEm Resource
Subject: FW: Comments on Advanced Notice of Proposed Rulemaking On Regulatory Improvements for Decommissioning Reactors, Docket NRC-2015-0070
Attachments: Comments on Advanced Notice of Proposed Rulemaking for Decommissioning docket NRC-2015-0070.pdf

DOCKETED BY USNRC—OFFICE OF THE SECRETARY

SECY-067

PR#: ANPR-26, 50, 52, 73, and 140

FRN#: 80FR72358

NRC DOCKET#: NRC-2015-0070

SECY DOCKET DATE: 1/4/16

TITLE: Regulatory Improvements for Decommissioning Power Reactors

COMMENT#: 017

From: Steve Root [mailto:rootsd@cox.net]
Sent: Sunday, January 03, 2016 2:24 PM
To: RulemakingComments Resource <RulemakingComments.Resource@nrc.gov>
Subject: [External_Sender] Comments on Advanced Notice of Proposed Rulemaking On Regulatory Improvements for Decommissioning Reactors, Docket NRC-2015-0070

To: Secretary
U.S. Nuclear Regulatory Commission
Attn: Rulemakings and Adjudications Staff

I am submitting comments on the U.S. Nuclear Regulatory Commission's Advanced of Proposed Rulemaking, Docket NRC-2015-0070 on my own behalf as a nuclear industry professional. I appreciate the opportunity to comment on the development of potential changes to the decommissioning process for nuclear power reactors. My comments, provided in the attached pdf file, relate to the physical security requirements during decommissioning.

Thank you!

Steven D Root, P.E.
Senior Nuclear Consultant

Hearing Identifier: Secy_RuleMaking_comments_Public
Email Number: 1462

Mail Envelope Properties (e3712dc69df54160ac88243d8895ecc2)

Subject: FW: Comments on Advanced Notice of Proposed Rulemaking On Regulatory Improvements for Decommissioning Reactors, Docket NRC-2015-0070
Sent Date: 1/4/2016 11:34:34 AM
Received Date: 1/4/2016 11:34:35 AM
From: RulemakingComments Resource

Created By: RulemakingComments.Resource@nrc.gov

Recipients:
"Rulemaking1CEM Resource" <Rulemaking1CEM.Resource@nrc.gov>
Tracking Status: None

Post Office: HQPWMSMRS03.nrc.gov

Files	Size	Date & Time
MESSAGE	1229	1/4/2016 11:34:35 AM
Comments on Advanced Notice of Proposed Rulemaking for Decommissioning docket NRC-2015-0070.pdf	160965	

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

To: U.S. Nuclear Regulatory Commission

Subject: Comments on Advanced Notice of Proposed Rulemaking on
Regulatory Improvements for Decommissioning Power Reactors
Docket Number NRC-2015-0070

I am submitting comments on the U.S. Nuclear Regulatory Commission's Advanced of Proposed Rulemaking on my own behalf as a nuclear industry professional. I appreciate the opportunity to comment on the development of potential changes to the decommissioning process for nuclear power reactors. My comments relate to the physical security requirements during decommissioning.

Comments on Section V.B of the Advanced Notice:

1. PSR-5: For a decommissioning power reactor, are both the central alarm station and a secondary alarm station necessary? If not, why not? If both alarm stations are considered necessary, could the secondary alarm station be located offsite?

Comments:

- 1.1. Yes, both alarm stations are necessary in order to meet the requirements of §73.55(i)(4)(ii). Specifically, paragraphs (F) and (G) require the concurrence and knowledge of alarm station operators in both alarm stations to change the status of a detection point or to deactivate a locking or access control device. For sites with a General License ISFSI issued under §72.210, this requirement remains in effect per §72.212 even after all irradiated fuel has been transferred from the Spent Fuel Pool to the ISFSI, although the location of the alarm stations may change as part of the transition from Protected Area(s) around both the Spent Fuel Pool and ISFSI (while irradiated fuel is present in both locations) to a Protected Area around the ISFSI alone (after all irradiated fuel is moved from the Spent Fuel Pool to the ISFSI).
- 1.2. For sites with a General License ISFSI issued under §72.210, both alarm stations should remain on site. §73.55(e)(9) requires both alarm stations to be maintained as Vital Areas, which is not possible at an offsite location. Additionally, locating the secondary alarm station offsite would present significant cyber security challenges, due to the need to maintain §73.55(i) capability in both alarm stations. Lastly, although 10 CFR 73.51(d)(3) allows a Specific License ISFSI to have one of its alarm monitoring stations located offsite and to receive only a "trouble alarm", the Specific License security requirements are more stringent in other areas (e.g., surveillance) and the Specific License process included opportunities for public input on each site which were not available to the public in the General License process under §72.210. As such, an exemption application submitted via license amendment is still appropriate for a Licensee that wants to move its secondary alarm station offsite.

Comments on other physical security requirements during decommissioning:

2. §73.55(e)(9) Vital Areas:

In order to shrink the Protected Area boundary from the spent fuel pool plus ISFSI to just the ISFSI, the reactor control room, spent fuel pool, the existing alarm stations, and the non-ISFSI security power supply areas have to be de-vitalized.

However, paragraph (v) of this section of the rule explicitly requires that the reactor control room, spent fuel pool, central alarm station and secondary alarm station be considered Vital Areas, and paragraph (vi) requires that the secondary power supplies for security equipment (alarm annunciation equipment and non-portable communications) also be within Vital Areas.

Consequently, de-vitalizing these areas presently requires an exemption from the rule, even though there would be no safety significance once the irradiated fuel has been moved to the ISFSI and the ISFSI security systems made stand-alone. Because such de-vitalizing will be needed for all reactor sites undergoing decommissioning, a rule change is appropriate to eliminate the need for these recurring exemptions from §73.55(e)(9).

3. 10 CFR 73.55(i) Detection and Assessment Systems

An exemption would not be needed to stand up new onsite alarm stations for the ISFSI that meet this section. However, a license amendment application would still be necessary and appropriate due to the security significance of moving the onsite alarm stations and disabling the old ones. For the new security rule in 2009, licensees included the temporary and permanent changes in alarm station locations and capability as part of the security plan changes submitted for NRC approval.