



**Nebraska Public Power District**

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US NUCLEAR REGULATORY COMMISSION  
WASHINGTON DC 25055-001

Subject: Comments for Docket ID: NRC-2015-0119-0001

Mr. Donnell: I would like to submit the following comments with regard to the referenced item:

Currently American Nuclear Insurers (ANI), the source of the \$375 million of primary coverage (insurance) under the Price Anderson Act provides two certified -copies of each endorsement to the facility form policy, workers policy and SFP certificate to their insureds to forward to the NRC.

Review of the implementation requirement: 10 CFR 140 do not reflect a need for these copies to go to the NRC. The requirement is for the licensee to provide NRC with a certified copy of the declaration page of a ANJ policy and by contract; ANI is required to notify NRC if coverage is cancelled. As referenced in:

<http://www.nrc.gov/reading-rm/doc-collections/cfr/part140/part140-0015.html>

The ANI policies issued are continuous until cancelled by either party and the insurers are contractually required to notify NRC in the event of cancellation.

Accordingly Nebraska Public Power District (NPPD) believes that based on the reading of Part 140, continuation of forwarding of insurance endorsements should be discontinued as it is unnecessary and a burden on ANI, licensee and NRC time. NPPD believes that no documentation as respects utilization of ANI insurance to meet the financial protection obligations of 10 CFR 140.15 should be required and such actions should be discontinued in order to reduce paperwork.

Sincerely,

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