

## Rulemaking1CEm Resource

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**From:** RulemakingComments Resource  
**Sent:** Wednesday, March 02, 2016 2:01 PM  
**To:** Rulemaking1CEm Resource  
**Subject:** FW: U.S. Nuclear Regulatory Commission's Advanced Notice of Proposed Rulemaking - Docket ID NRC-2015-0070  
**Attachments:** CoalCityCUSDComent\_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: 3/1/16  
TITLE: Regulatory Improvements for Decommissioning Power Reactors  
COMMENT#: 044

-----Original Message-----

From: Vota, Karen [mailto:KVota@ccu1.net]  
Sent: Tuesday, March 01, 2016 10:48 AM  
To: RulemakingComments Resource <RulemakingComments.Resource@nrc.gov>  
Subject: [External\_Sender] U.S. Nuclear Regulatory Commission's Advanced Notice of Proposed Rulemaking - Docket ID NRC-2015-0070

Rulemakings and Adjudications Staff,

A public comment from Coal City Community Unit School District #1 regarding decommissioning regulations is attached.

Kent A. Bugg, Ph.D.  
Superintendent  
Coal City CUSD #1

# COMMUNITY UNIT SCHOOL DISTRICT NO. 1

## Board of Education

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100 SOUTH BAIMA STREET  
COAL CITY, ILLINOIS 60416-1663

**KENT A. BUGG, Ph.D.**  
**Superintendent**

JASON SMITH, Chief School Business Official  
TAMMY ELLEDGE, Director of Curriculum/Instruction  
SANDY RAKES, Director of Special Populations

## Building Administration

MITCHELL HAMANN, Principal  
High School 815-634-2396  
TRAVIS JOHNSON, Principal  
Middle School 815-634-5039  
TRACY CARLSON, Principal  
Intermediate School 815-634-2182  
CHRISTOPHER SPENCER, Principal  
Elementary School 815-634-2334  
CHRISTOPHER SPENCER, Principal  
Early Childhood Center 815-634-5042

District Phone: 815-634-2287  
District Fax: 815-634-8775

[www.coalcity.k12.il.us](http://www.coalcity.k12.il.us)

March 1, 2016

Secretary

U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
[Rulemaking.Comments@nrc.gov](mailto:Rulemaking.Comments@nrc.gov)

ATTN: Rulemakings and Adjudications Staff

*VIA EMAIL*

**RE: U.S. Nuclear Regulatory Commission's Advanced Notice of Proposed Rulemaking  
(Docket ID NRC-2015-0070)**

Dear Secretary,

Coal City Community Unit School District No. 1 (the "District") is a local governmental body with a vested interest in the future of Exelon Generation Company's ("Exelon") Dresden Nuclear Generating Station ("Dresden Station") located in Morris, Illinois. The impact of Dresden Station within its host community is significant. Exelon is the predominant taxpayer in the District – representing approximately 66% of the District's equalized assessed value in tax year 2014. It is also the largest employer in the area – employing approximately 900 employees.

Dresden Unit 2 was issued an initial operating license in 1991, which was renewed in 2004. Its current license is scheduled to expire in 2029. Dresden Unit 3 was issued an initial operating license in 1971, which was renewed in 2004. Its current license is scheduled to expire in 2031. The District does not know whether Exelon will apply for Subsequent License Renewals for Dresden Station.

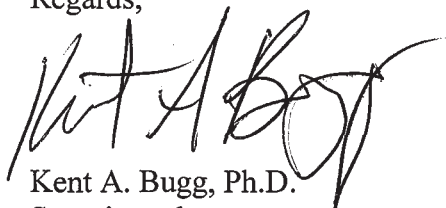
This comment is being submitted in response to Section V of the Advanced Notice of Proposed Rulemaking ("ANPR") entitled "Specific Considerations," which asks whether the current role of the States, members of the public, or other stakeholders in the decommissioning process should be expanded or enhanced, and whether the NRC's regulations should mandate the formation of advisory panels. The District strongly supports an expanded role for State and local governmental bodies and NRC regulations to mandate the formation of advisory panels.

Should Exelon announce its intention to permanently close Dresden Station at any point in time, it is only appropriate that the local governmental bodies have the opportunity to discuss the closure and decommissioning of the station and provide input regarding the impact such closure and decommissioning will have on the local governmental bodies and their constituents. Topics of discussion should include, in part, the timing of decommissioning, the owner and/or operator's continuing obligations to the local governmental bodies, and options for mitigating the impact of closure on the host community. These topics are of particular importance because it remains unknown when the spent fuel will be removed from the site. The severity of the potential impacts of closing the community's predominant taxpayer and largest employer necessitate an approach that incorporates such considerations.

As Section V of the ANPR acknowledges, State and local governmental bodies are often involved in an advisory capacity (as part of a community engagement panel, for example) for most decommissioning sites. The formation of such panels, however, is not currently required by NRC regulations. Given the significant impact of nuclear plant closure and decommissioning on host communities, the NRC regulations should mandate the formation of advisory panels that include State and local governmental bodies. It is the District's hope that such panels would foster communication and information exchange between the owners of nuclear power stations and local governmental bodies from the host communities in order to plan for and mitigate the impacts of decommissioning on the host communities.

Thank you for the opportunity to comment on the U.S. Nuclear Regulatory Commission's Advanced Notice of Proposed Rulemaking, Docket ID NRC-2015-0070.

Regards,

A handwritten signature in black ink, appearing to read "Kent A. Bugg". The signature is stylized and cursive, with a large, sweeping flourish at the end.

Kent A. Bugg, Ph.D.  
Superintendent  
Coal City CUSD #1