

Rulemaking1CEm Resource

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COMMENT#: 110

From: Jurek, Shane M. [mailto:Shane.Jurek@xenuclear.com]
Sent: Friday, March 18, 2016 4:11 PM
To: RulemakingComments Resource <RulemakingComments.Resource@nrc.gov>
Subject: [External_Sender] Docket NRC-2015-0070

See the attached for the comments of Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy, with respect to the subject docket.

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March 18, 2016

L-XE-16-004
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Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemaking and Adjudications Staff

Comments on Advance Notice of Proposed Rulemaking, Regulatory Improvements for Decommissioning Power Reactors (Docket ID NRC-2015-0070)

Northern States Power Company, a Minnesota corporation (NSPM), d/b/a Xcel Energy, is providing this letter in response to the NRC request for comment on the subject Advance Notice of Proposed Rulemaking (ANPR) on Regulatory Improvements for Decommissioning Power Reactors. NSPM, the owner and operator of the Monticello Nuclear Generating Plant (MNGP) and Prairie Island Nuclear Generating Plant (PINGP), has been an active participant in the NRC and industry meetings regarding this topic and endorses the comments provided by the Nuclear Energy Institute (NEI) on March 17, 2016.

Ensuring that the NRC's decommissioning process is efficient and does not require the NRC or its licensees to expend unnecessary resources is important. Eliminating unnecessary licensing actions prevents NSPM from having to collect more than is necessary from the customers of NSPM, who are currently contributing to the MNGP and PINGP Decommissioning Trust Funds. NSPM supports the following statements as noted by the NRC in the ANPR dated November 19, 2015:

- “The NRC has not identified any significant risks to public health and safety in the current regulatory framework for decommissioning power reactors. Consequently, the need for a power reactor decommissioning rulemaking is not based on any identified safety-driven or security-driven concerns” and,
- “The primary objective of the decommissioning rulemaking is to implement appropriate regulatory changes that reduce the number of licensing actions needed during decommissioning.”

This is consistent with the NRC's Project AIM 2020 by helping the agency to accomplish its safety and security mission more effectively and efficiently while operating with fewer resources over the next several years.

NSPM wishes to emphasize the following key points consistent with the NEI comments:

- NRC should move forward with an expedited, limited-scope rulemaking to codify the changes that are directly related to the NRC's stated primary objective which is to "reduce the number of licensing actions needed during decommissioning."
- To clarify regulatory requirements and to promote consistency within the industry, NRC should prioritize, review, and endorse NEI guidance documents recently submitted on: (1) use of the nuclear decommissioning trust fund; (2) managing personnel fatigue at decommissioning facilities; and (3) certified fuel handler training programs.

If you have any question or require additional information, please contact Mr. Terry Pickens, Director – Nuclear Regulatory Policy, at (612) 330-1906.

A handwritten signature in cursive script that reads "Ava L Scott for".

Martin C. Murphy
Director – Nuclear Licensing and Regulatory Affairs
Northern States Power Company-Minnesota