

Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Monday, March 21, 2016 8:00 PM
To: Rulemaking1CEm Resource
Subject: Comment on ANPR-26, 50, 52, 73, and 140 - Regulatory Improvements for Decommissioning
Attachments: Comment of Scarpello on behalf of Indiana Michigan Power.pdf

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

FRN#: 80FR72358

NRC DOCKET#: NRC-2015-0070

SECY DOCKET DATE: 3/18/16

TITLE: Regulatory Improvements for Decommissioning Power Reactors

COMMENT#: 123

March 18, 2016

AEP-NRC-2016-30

Docket Nos.: 50-315
50-316

Secretary
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

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

Dear Sir or Madam:

Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP) Units 1 and 2, is providing this letter in response to the Nuclear Regulatory Commission (NRC) request for comment on the subject, Advance Notice of Proposed Rulemaking on Regulatory Improvements for Decommissioning Power Reactors. I&M 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).

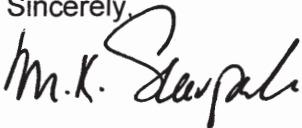
I&M maintains a Nuclear Decommissioning Trust (NDT) to provide reasonable assurance that funding will be available to decommission CNP Units 1 and 2 at the end of its operating license. As a rate regulated utility, I&M deposits collections from customers to fund the NDT. A transparent and predictable process for transition from operating to decommissioning helps assure State and Federal rate regulators that the NDT will efficiently and effectively fund decommissioning when necessary. Therefore, I&M emphasizes the following key points that are consistent with the NEI comments:

- An expedited, limited-scope rulemaking focused on assuring efficient and effective transition from operation upon unit shutdown more readily provides rate regulatory agencies the assurance that the decommissioning process is transparent and predictable compared to other rulemaking alternatives considered by the NRC.
- NRC should continue to dedicate resources to prioritize site-specific licensing actions necessary for the transition from operation to decommissioning, to ensure timely and predictable regulatory review of requested licensing actions.
- 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.

- 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."

This letter contains no new commitments. Should you have any questions or require additional information, please contact R. B. Haemer, Senior Counsel, (202) 383-3432 or rbhaemer@aep.com.

Sincerely,



Michael K. Scarpello
Regulatory Affairs Manager

DB/ml

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