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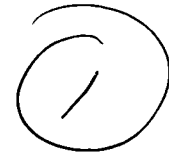
August 18, 2016

L-2016-171

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ATTN: Cindy Bladey
Office of Administration
Mail Stop: OWFN-12-H08
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

8/16/2016
81FR 43959



Subject: Comments on Consideration of Rulemaking to Address Prompt Remediation of Residual Radioactivity During Operations, NRC Docket ID NRC-2011-0162, Federal Register 43959 Vol. 81, No. 129, July 6, 2016

Florida Power and Light Company, the licensee for the St. Lucie Nuclear Plant, Units 1 and 2, and the Turkey Point Nuclear Plant, Units 3 and 4, together with its affiliates, NextEra Energy Duane Arnold, LLC, the licensee for Duane Arnold Energy Center; NextEra Energy Point Beach, LLC, the licensee for Point Beach Nuclear Plant, Units 1 and 2, and NextEra Energy Seabrook, LLC, the licensee for Seabrook Station (hereafter referred to collectively as "NextEra"), is pleased to provide these comments on the U.S. Nuclear Regulatory Commission (NRC) staff's consideration of a potential rulemaking to address prompt remediation of residual radioactivity during operations. NextEra endorses the comments of the Nuclear Energy Institute, dated August 18, 2016.

As explained in the NEI comments, NextEra along with the nuclear industry, remains committed to minimizing, detecting and monitoring contamination during operations and decommissioning to reduce exposures and minimize generation of radioactive waste. These goals can be and are being met through compliance with the NRC's existing requirements. Compliance with the NRC's Part 20 dose limits, decommissioning recordkeeping requirements, decommissioning funding requirements, ALARA programs, and the voluntary groundwater initiative provide strong assurance that nuclear reactor sites will not become legacy sites.

SUNSI Review Complete

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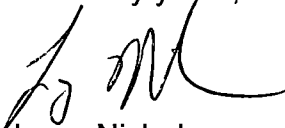
E-RIDS= ADM-03

Add= M. Vaaler (mgr)

Further, as explained in SECY 13-0108, "Staff Recommendations for Addressing Remediation of Residual Radioactivity During Operations" a rule mandating prompt remediation would affect the operation of a facility and therefore would be considered backfitting if applied to Part 50 licensees. In light of the regulatory framework outlined above and the lack of history of licensed reactors becoming legacy sites, NextEra does not believe that a prompt remediation requirement could be shown to present the substantial safety benefit necessary to support a potential backfit applied to Part 50 licensees.

To the extent the NRC concludes that a prompt remediation rulemaking effort is necessary, NextEra strongly encourages the NRC to clearly state at the outset of the rulemaking proceeding, that it would not be applicable to Part 50 licensees.

Sincerely yours,

A handwritten signature in black ink, appearing to read "L. Nicholson", written over the typed name.

Larry Nicholson
Director, Nuclear Licensing and Regulatory Compliance