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# PUBLIC SUBMISSION

**Docket:** NRC-2015-0070

Regulatory Improvements for Power Reactors Transitioning to Decommissioning

**Comment On:** NRC-2015-0070-0178

Regulatory Improvements for Power Reactors Transitioning to Decommissioning; Request for Comment on Draft Regulatory Basis

**Document:** NRC-2015-0070-DRAFT-0219

Comment on FR Doc # 2017-05141

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## Submitter Information

**Name:** Lansing Dusek

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## General Comment

Please see attached letter file - Fluor Enterprises, Inc. comments on the NRC Draft Regulatory Basis Document and Preliminary Draft Regulatory Analysis Supporting Power Reactor Decommissioning Rulemaking

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## Attachments

Fluor-NRC Letter, Comments on Decommissioning Rulemaking draft Reg Basis and Reg Analysis  
13Jun2017



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June 13, 2017

Ms. Annette Vietti-Cook  
Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

ATTN: Rulemakings and Adjudications Staff

**Subject:** Fluor Response to NRC Requests for Comments on the NRC Draft Regulatory Basis Document and Preliminary Draft Regulatory Analysis Supporting Power Reactor Decommissioning Rulemaking (Docket ID NRC-2015-0070)

Dear Ms. Vietti-Cook:

Fluor Enterprises, Inc. (Fluor) is submitting this letter in response to the U.S. Nuclear Regulatory Commission (NRC) requests for comments on a draft Regulatory Basis Document (RBD)<sup>1</sup> and a preliminary draft regulatory analysis,<sup>2</sup> both of which support an NRC rulemaking proposing changes to the Commission's decommissioning regulations (Docket ID NRC-2015-0070). Fluor appreciates the opportunity to provide comments to the NRC on the draft RBD and preliminary draft regulatory analysis.

Fluor endorses the comments submitted to the NRC by the Nuclear Energy Institute (NEI) by letter dated June 13, 2017, on both the draft RBD and the preliminary draft regulatory analysis.<sup>3</sup> Fluor agrees with NEI that, in general, these draft documents provide a sound foundation for several regulatory improvements that would, if implemented, achieve the primary objective stated in the NRC's Advanced Notice of Proposed Rulemaking,<sup>4</sup> that is, "...to implement appropriate regulatory changes that reduce the number of licensing actions needed during decommissioning." Fluor believes that the aforementioned NEI comments represent additional opportunities for the NRC to further clarify and improve these documents and the associated rulemaking.

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<sup>1</sup> 82 FR 13778 (March 15, 2017)

<sup>2</sup> 82 FR 21481 (May 9, 2017)

<sup>3</sup> Letter from R. McCullum (NEI) to A. Vietti-Cook (NRC), *NEI Comments on the NRC Draft Regulatory Basis Document Regulatory Improvements for Power Reactors Transitioning to Decommissioning*; Docket ID: NRC-2015-0070 (June 13, 2017)

<sup>4</sup> 80 FR 72358 (November 19, 2015)

Ms. Annette Vietti-Cook

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Fluor joins NEI in urging the NRC to continue its efforts to complete power reactor decommissioning rulemaking to improve the efficiency of the transition from operations to decommissioning as expeditiously as possible. If you have any questions, please contact me at (864) 517-1386, [lansing.dusek@fluor.com](mailto:lansing.dusek@fluor.com).

Sincerely,



Lansing G. Dusek

cc: R. McCullum, NEI  
M. Richter, NEI