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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-0221

Comment on FR Doc # 2017-05141

Submitter Information

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General Comment

See attached file(s)

Attachments

CDPH comments on NRC decommissioning document-submitted



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EDMUND G. BROWN JR.
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June 13, 2017

SUBJECT: Docket ID: NRC-2015-0070: Regulatory Improvements for Power Reactors Transitioning to Decommissioning, Request for Comment.

The Nuclear Emergency Response Program (NERP) of the California Department of Public Health (CDPH) appreciates the opportunity to review and provide comments on the NRC document “*Regulatory Improvements for Power Reactors Transitioning to Decommissioning*”, posted March 15, 2017.

Comments:

1. Page A-10, Graded Standards of Emergency Preparedness, First Paragraph: In order to facilitate the understanding of NRC’s proposed planning standards, a figure should be used such as one shared during NREP conference 2017 (Slide #14, Presenter: Robert Kahler). The figure can be made more robust by adding information on the situation of the fuel in each of the levels as discussed on page A-5, Option 2, first paragraph.
2. Page A-16, First Paragraph, Last Sentence: The NRC staff proposes to remove HAB requirements for the 8-year exercise cycle starting in Level 1. Considering the frequency of hostile/terrorist activities in the current times we propose that HAB requirements for the 8-year exercise cycle remain in place during the Level 1 phase of decommissioning.
3. Page A-25, Offsite Response Organization Participation in Drills and Exercises, First Paragraph, Last Sentence: It is stated that “although licensees in Level 2 would be required to offer ORO’s the opportunity to participate”. Similarly on page A-21, in the last paragraph it is mentioned that “licensees would still maintain a variety of capability that may be available to support ORO’s in EP...”. For the ORO’s to participate in any of the activities offered by licensees it is crucial that financial support is provided to the OROs. Some kind of wording should be added to this section/s indicating that it would be prudent for the ORO’s to have Memorandum of Understanding with licensee addressing any support ORO’s would provide to licensee during the Level 2 phase of the decommissioning.

Minor comments:

4. Acronym list is incomplete. Acronyms like SECY, MBDDBE, SAFSTOR, DECON, PSEP, IOEP are missing. Please edit as needed.
5. It is difficult to identify headings, sub-heading, sub-sub-headings for different sections. Please edit the formatting to make it easier for the reader.
6. Appendix A has two tables and both are labeled as “Table 1”. Please edit as needed.

