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FLORIDA DEPARTMENT OF HEALTH & REHABILITATIVE SERVICES

*Working in partnership with local communities to help people be self-sufficient,
experience good health and live in stable families and communities.*

November 20, 1996



John C. Hoyle
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attn: Chief of Docketing and Services Branch

Dear Mr. Hoyle:

This letter is regarding the recent request for comments on NRC's strategic assessment and rebaselining of its regulatory activities. Florida, as an Agreement State, would like to provide comments on the direction setting issue paper number 24, "Decommissioning - Power Reactors."

Attached are comments on this issue paper. Thank you for the opportunity to comment and for the extension of the comment period on these issues.

Sincerely,

William A. Passetti
Acting Chief
Bureau of Radiation Control

WAP/ngh
Attachment

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**Comments on USNRC'S Strategic Assessment and Rebaselining Initiative
by Florida's Bureau of Radiation Control**

Direction Setting Issue Paper #24
"Decommissioning - Power Reactors"

Issue

What should be NRC's strategy for regulating decommissioning activities at power reactor sites?

Summary

We support the Commission's preliminary views to continue the current direction and approach and to expand the implementation guidance to explore more innovative approaches.

On page 15 of the issue paper, an example of a new and innovative regulatory approach was stated that suggested the transfer of nuclear power plants to Agreement State control after fuel has been put into dry storage or has been removed from the Part 50 site. We agree that under certain circumstances this approach may be desirable. However, this should not be a regulatory requirement that is mandated to the states, but rather an option that should be available if it is determined that it would be beneficial in the decommissioning of a power reactor.