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Comment On: NRC-2017-0153-0001
Draft Fiscal Years 2018-2022 Strategic Plan; Request for Comment on Draft NUREG

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9/26/2017 *(5)*
82 FR 44858

Submitter Information

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Organization: NYSERDA
Government Agency Type: State
Government Agency: NYSERDA

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FILES AND DIRECTORIES
BRANCH
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General Comment

See attached file(s)

Attachments

New York State comments on NRC strategic plan (10-26-17)

SUNSI Review Complete
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Add= *A. Ferkite (AXF3)*
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October 26, 2017

Cindy Bladey, Chief
Rules, Announcements, and Directives Branch
Office of Administration
Mail Stop: TWFN-08-E18
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Docket ID NRC-2017-0153

Subject: NUREG-1614, Volume 7, "Draft Strategic Plan: Fiscal Years 2018-2022"

Dear Ms. Bladey,

On September 26, 2017, the U.S. Nuclear Regulatory Commission published for comment a draft Strategic Plan covering fiscal years 2018-2022 (Federal Register 82 FR 44859). The New York State Energy Research and Development Authority and the New York State Department of Public Service offer the following proposed additional Safety Strategy for incorporation into the Strategic Plan:

Safety Strategy 9, Ensure safe, comprehensive, and timely radiological decommissioning of the 20+ plants currently undergoing decommissioning or that are expected to come offline in the time period covered by the Strategic Plan and apply lessons learned from previous decommissioning projects to make sure that nuclear decommissioning trusts have ample funds on hand to remove on-site radiation and protect the interests of sovereign states, communities, and ecosystems that host such facilities.

CONTRIBUTING ACTIVITIES

- Ensure that the decommissioning trust funds are unconditionally protected from bankruptcy or other insolvency, and are used for radiological decommissioning purposes and not used for on-site storage of high-level waste, spent fuel management, taxes, legal fees, or liability insurance.
- Work with host states and communities to ensure that the facility owner provide financial and regulatory resources to safely decommission facilities and remove radiation from state natural resources (e.g., groundwater, rivers, soil).

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- Establish stakeholder best practices based on past decommissioning experience to address host state and community stakeholder questions about the process.
- Return surplus funds, if any, to ratepayers who contributed monies to nuclear decommissioning trust funds.

If you have any questions, you may contact me at (518) 862-1090 x3274 or alyse.peterson@nyserda.ny.gov.

Sincerely,

A handwritten signature in cursive script that reads "Alyse Peterson".

Alyse Peterson, P.E.
State Liaison Officer Designee
Energy and Environmental Analysis
New York State Energy Research and Development Authority