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CNRO-2018-0007

March 8, 2018

Mr. Victor M. McCree  
Executive Director for Operations  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: Regulatory Improvements for Power Reactors Transitioning to Decommissioning  
(Docket ID NRC-2015-0070)

Dear Sir:

Effective February 1, 2018, Entergy is no longer a member of the Nuclear Energy Institute (NEI). The purpose of this letter is to inform the NRC that Entergy remains committed to being actively engaged in the NRC's efforts to improve the regulatory process for power reactors transitioning to decommissioning.

With four licensees scheduled to permanently cease operations in the next several years (Pilgrim in 2019, Indian Point Unit 2 in 2020, Indian Point Unit 3 in 2021, and Palisades in 2022), Entergy has a vested interest in the outcome of the regulatory improvement efforts in the area of decommissioning. Prior to the withdrawal from NEI, Entergy had been an active participant in the NRC and industry meetings regarding this topic. Entergy requests that it be given the opportunity to participate in any discussions between the NRC and industry on the rulemaking and development of industry guidance in this area.

Although not offered for public comment, Entergy is providing the following points of view on the Regulatory Basis Document that was issued in November 2017 for the staff to consider in the development of the rule:

- Carefully consider how the proposed guidance will yield actual efficiencies for the NRC and licensees.
- The staff should refrain from developing any options that would require NRC approval of the Post Shutdown Decommissioning Activities Report.
- The rule should ensure that measures that have not been historically necessary to store fuel in a safe and secure manner are not inadvertently imposed on those facilities that have substantially completed decommissioning.
- As the staff further examines insurance requirements applicable to decommissioning reactors, Entergy urges them to develop Option 3 as outlined in Section 4.3 of the Regulatory Basis, providing a rational four-tier approach to such requirements.

If you have any questions or require additional information, please contact me at (504) 450-8134.

Sincerely,

A handwritten signature in black ink that reads "Sue Slobodin". The signature is fluid and cursive, with "Sue" on top and "Slobodin" below it.

SS/plc