

PRM-50-119
84FR27209

6

PUBLIC SUBMISSION

| |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| As of: 8/27/19 8:30 AM Received: August 26, 2019 Status: Pending_Post Tracking No. 1k3-9btw-rkqu Comments Due: August 26, 2019 Submission Type: Web |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Docket: NRC-2019-0083

Access to the Decommissioning Trust Fund for the Disposal of Large Components

Comment On: NRC-2019-0083-0002

Access to the Decommissioning Trust Fund for the Disposal of Large Components

Document: NRC-2019-0083-DRAFT-0007

Comment on FR Doc # 84 FR 27209

Submitter Information

Name: Gregory Martin

Submitter's Representative: Gregory Martin

Organization: Mitsubishi Nuclear Energy Systems

General Comment

See attached file(s)

Attachments

NOPS-LTR-19-00002

26th August 2019

NOPS-LTR-19-00002

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

ATTN: Rulemakings and Adjudication Staff

**Subject: Access to the Decommissioning Trust Fund for the Disposal of Large Components,
Docket No. PRM-50-119**

Reference(s): N/A

Dear Sir/Madam,

This letter is submitted to express our support for the petition for rulemaking from Gerard P. van Noordennen on behalf of EnergySolutions, LLC, dated February 22, 2019 and docketed on March 20, 2019 as Docket No. PRM-50-119.

The petition requests that the NRC amend 10 CFR Part 50 to revise the definition of decommissioning in § 50.2 and amend § 50.82 to allow access to the decommissioning trust fund before the permanent cessation of operations at nuclear power plants. The cover letter submitted by EnergySolutions, LLC for the petition set forth seven key reasons why the objective of the petition is worthwhile, timely, and in the best interest of the nuclear industry, the environment and in addressing certain stakeholder concerns. We fully agree with those seven points and request that the NRC proceed with a rulemaking to incorporate the requested changes into the decommissioning regulatory infrastructure.

The Major Radioactive Components (MRC's) which are the subject of the petition are destined for disposal and the nuclear utilities should have the flexibility to use decommissioning trust funds during operations to facilitate timely disposal of these components. The petition sets forth a robust process to ensure that adequate decommissioning trust funds will be available and modifies the definition of decommissioning recognizing that disposal of MRCs can take place during operations in support of final decommissioning. Accordingly, the requested modifications do not in any way serve to compromise the funding process in support of final decommissioning and provides much needed flexibility for the nuclear utilities.

The NRC publishing a *Federal Register* Notice soliciting comments on this very important topic is a positive step and we encourage the agency to proceed with the rulemaking requested by EnergySolutions, LLC. The nuclear industry has significant experience with the decommissioning of nuclear power plants in the United States and much has changed over the past twenty plus years as set forth in the petition. The time has come to capitalize on that experience and realize the current market trends impacting nuclear power plants by modernizing the decommissioning regulatory process.



Thank you very much for the opportunity to comment on this important and timely topic. We will continue to closely monitor the progress around this issue and will look forward to providing more detailed comments or take part in public meetings should the petition result in a rulemaking initiative.

Sincerely,

A handwritten signature in black ink, appearing to read "G. L. Martin", is written over a horizontal line.

Gregory L. Martin
Vice President – Nuclear Operations
Mitsubishi Nuclear Energy Systems, Inc.