

DUKE POWER COMPANY

P. O. BOX 33189

GENERAL OFFICES

TELEPHONE: AREA 704
373-4011

422 SOUTH CHURCH STREET

CHARLOTTE, N. C. 28242

April 27, 1981

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch

Re: Draft GEIS on Decommissioning of Nuclear Facilities
(NUREG-0586)
Duke File: GS-N-5.10

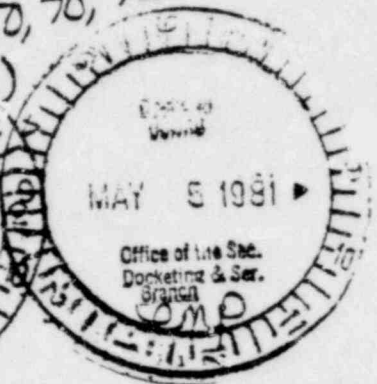
PROPOSED RULE

PR-30, 40, 50, 70, 72

(46 FR 11666)



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On February 10, 1981 the Nuclear Regulatory Commission published in the Federal Register (FR 11666) a Notice of Availability of the Draft Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities, NUREG-0586, dated January, 1981. The Federal Register Notice invited comments from interested persons on the Draft GEIS.

Duke Power Company currently has in operation 4 nuclear reactors and has under construction 5 additional units scheduled for operation between now and the mid-1990's. In preparing for the development of these nuclear reactors, Duke has considered the ultimate need to decommission these units and on that basis submits comments to the Draft GEIS.

Duke Power Company is a participant in the Utility Decommissioning Group which filed comments on the Draft GEIS on April 22, 1981. In addition, Duke has been involved in the development of comments by the Decommissioning Subcommittee of the Atomic Industrial Forum. The AIF comments highlight several significant aspects of the Draft GEIS which are of concern to Duke Power Company. The Utility Decommissioning Group comments also reflect the views of Duke Power Company. By this letter, Duke adopts and endorses the comments of both these groups and urges the Commission to take the appropriate actions recommended by the groups in the development of any rules or new criteria for the decommissioning of power reactors.

As a specific comment, Duke believes that the NRC Staff should consider, in great detail, the potential for the permanent entombment of power reactors as a decommissioning mode. This potential alternative could provide the utility industry with the most economical and environmentally acceptable decommissioning mode. It should not be ignored by the NRC.

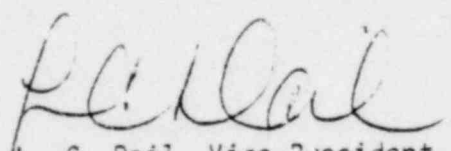
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We look forward to the issuance of the Final GEIS on this decommissioning re-evaluation and would expect to participate in any proposed rulemaking that may take place. We believe that preservation of a case by case approach for decommissioning is most practical and urge the Staff to preserve that option.

Very truly yours,



L. C. Dail, Vice President
Design Engineering Department

DBB/pam

cc: Nicholas S. Reynolds
E. David Harward