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UNION ELECTRIC

February 11, 1994

ULNRC-2956

Mr. David L. Meyer, Chief
Rules Review and Directives Branch
Division of Freedom of Information
and Publication Services
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Meyer:

U.S. Nuclear Regulatory Commission draft NUREG/CR-5884, "Revised Analyses of Decommissioning for the Reference Pressurized Water Reactor Power Station," and draft NUREG/CR-6054, "Estimating Pressurized Water Reactor Decommissioning Costs"

Reference: 58 *Federal Register* 54385 (October 21, 1993) Request for Comments

Attached please find Union Electric's comments on the subject draft NUREGs. We appreciate the opportunity to comment on this issue and the extension of the public comment period from December 31, 1993, to February 15, 1994.

In addition, Union Electric fully endorses the comments submitted by the Nuclear Management and Resources Council (NUMARC).

Please contact us if there are any questions concerning this letter.

Very truly yours,

for Alan C. Passwater
Manager, Licensing & Fuels

WEK/kea
Attachment

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UNION ELECTRIC COMMENTS
NUREG/CR-5884 & NUREG/CR-6054

NUREG/CR-5884, Volume 1

Tables 3.2 and 3.3 show staffing levels which are about one-fourth those assumed in a site specific study performed by a consultant in 1993 for Callaway Plant. The staffing levels shown in the draft NUREG are apparently the minimum acceptable for funding purposes. If this is the case, it should be so stated since there appears to be some disagreement in the industry regarding required decommissioning staffing.

There are some inconsistencies in the staffing levels shown in the staff organizational structure charts. Figure 3.4 shows 23 persons in the Health Physics group; this should be 22, according to the breakdown. Figure 3.5 shows 13 in the Security group; this should be 12. Figure 3.6 shows 11 in the Utility Plant Operations group; this should be 12. That figure also shows 13 in the DOC D&D Engineering group; this should be 11.

Page 3.59 states that requiring funding to be calculated in constant dollars prior to reactor shutdown results in about a 22% overestimate of the funding needs for DECON, providing a significant safety margin to cover unforeseen events. In light of the 25% contingency included in the cost estimate, it seems reasonable to allow credit for fund growth during the 9 year decommissioning phase.

The words, "Radiation Dose" in the heading of Table 4.1 are out of alignment. They should be above "Estimated (person-rem)" - see Table 3.1.

NUREG/CR-5884, Volume 2

Section B.14 discusses contingency, and concludes by recommending a contingency factor of 25% be applied to the bottom line. Since this is such a significant cost contributor, it may be appropriate to allow the licensee to apply specific contingencies to each line item.

Section C restates verbatim much of NUREG/CR-6054. Consideration should be given to deleting this section from -5884; all discussion of the Cost Estimating Computer Program more appropriately belongs in -6054. If section C were deleted, the two volumes of NUREG/CR-5884 could be consolidated. (Furthermore, Figure 2.2 of -6054 is inconsistent with Figure C.2 of -5884 regarding sequence of data entry for menu items A, B, and C.)

Section E describes the components of the reactor and internals. Figures E.1 and E.2 show many of these, but not all components are labeled and the names of those which are labeled do not always have the same names used in the text.

UNION ELECTRIC COMMENTS
NUREG/CR-5884 & NUREG/CR-6054

NUREG/CR-6054

There should be a section for each data entry screen, which describes each data entry parameter and how it is used by the CECP. (e.g., Menu item A of the CECP asks for site size, apparently using this figure to calculate taxes for a specific plant based on site acreage; menu item H asks for Property Taxes ($/year) for each period. NUREG/CR-5884, Volume 2, Section B.9.2 describes property tax calculation assumptions, but it is not clear how the site size is used in the CECP.) It may be appropriate to incorporate Section C from NUREG/CR-5884 into this NUREG.

When viewing an input file and not changing data, the user should be able to back directly out using the Alt-X combination (or preferably just Esc) without having to go through the "Save Data to a File" box.

The program should provide for an automatic update of all files necessary to reflect changes to input parameters. Currently, only some files are updated automatically; but files related to decommissioning periods and overhead staffing must be updated manually before calculating final cost.

The schedule start dates for periods after period 1 should be automatically input by the CECP, since this date is by definition the same as the end date for the previous period.

Pressing enter for an entry sometimes gives a blank, and other times gives an editable line. It would be more convenient if the line were always editable.

Since staffing is the largest single cost contributor, it may be useful to allow for different overhead values for subsets of utility and DOC staff, such as administrative and general labor.

On page 4.31 (line 5) there is a typo: "N" should be "D".

Line items listed as "Other" in the printout of *.PRG files are listed as "DOC" in the summary line. This is correctly addressed in *.PRI files.

Input screen *.PRE and file *.PDE show volume and weight in opposite order. It would facilitate review if they were consistent.

Files *.PDA, *.PDD, *.PDE, and *.PDG may not be read in DOS. It would facilitate review and documentation if they were ASCII text files.

10CFR50.75 (General Comment)

10CFR50.75(e)(1)(ii) requires that funds sufficient to pay radiological decommissioning costs be available at the time operations termination is expected. This means a utility may not take credit for fund growth during the several-year decommissioning project, even though the fund would actually continue to grow. 10CFR50.75 should be changed to allow for fund growth during decommissioning.

This action would allow for additional fund growth, thereby reducing annual funding to a level needed to assure funds are available only when they are anticipated to be expended during the decommissioning project. The funding cost savings would be on the order of $1,000,000 per year per reactor, using typical forecast and fund allocation assumptions.

While Union Electric may not realize this annual savings, there would be a reduction in the risk of underfunding for radiological decommissioning at the time of operations termination.