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Nuclear Department

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OFFICE OF STATE AND PUBLIC AFFAIRS

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Mr. David L. Meyer
Chief, Rules Review and Directives Branch
Division of Freedom of Information and Publication Services
Mail Stop P-223
United States Nuclear Regulatory Commission
Washington, DC 20555

Sir:

PUBLIC SERVICE ELECTRIC AND GAS COMPANY (PSE&G)
COMMENTS ON DRAFT NUREG/CR-5884
ANALYSES OF DECOMMISSIONING FOR THE REFERENCE
PRESSURIZED WATER REACTOR POWER STATION

PSE&G has reviewed the draft report and offers the attached comments for your consideration. Please contact Mr. Quresh Dahodwala at (609) 339-1271 if you have any questions regarding the attached comments.

Sincerely,

F. X. Thomson
Manager - Licensing and
Regulation

Attachment

C G. J. Mencinsky
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Mail Stop NLS-139
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The power is in your hands.

ATTACHMENT 1

1. Independent Spent Fuel Storage Installation (ISFSI):

The draft report correctly assumes the existence of an on-site ISFSI to allow decommissioning activities to proceed. However, the report does not include costs associated with such an ISFSI in the total decommissioning cost estimate.

The Department of Energy spent fuel disposal program status indicates that the first off-site spent fuel shipment may not commence until around 2015, although 2010 is the official start date of a possible repository at Yucca Mountain. Moreover, lack of progress on the Monitored Retrievable Storage (MRS) facility suggests that spent fuel may not be shipped off-site any time soon either, for temporary storage. Further, given the oldest fuel first spent fuel acceptance criteria, spent fuel shipments from Salem and Hope Creek units are expected to occur much later than the year 2015. Therefore, we expect to incur costs associated with on-site storage at an ISFSI during the plant operation and decommissioning periods.

We recommend that all expected costs associated with an ISFSI such as design, construction and operation, incurred during the decommissioning phase of the plant be included in the decommissioning estimate. The design and construction related costs could occur during the decommissioning phase because the ISFSIs are expected to be expanded incrementally, as needed. The operation costs will occur until the last spent fuel assembly is shipped off-site.

2. Low Level Waste:

There is a large uncertainty related to the low level waste disposal charges. As waste generators reduce waste volumes using state of the art volume reduction techniques, the unit burial costs are expected to increase to maintain the economic feasibility of the burial facility. Therefore, the equilibrium burial cost has not been identified at this time. The economic forces at the time of decommissioning will determine these costs.

3. Decommissioning Project Schedule:

It appears that the draft report does not provide sufficient detail of the overall project schedule. We believe it is important to identify critical path activities during decommissioning. In our opinion decommissioning costs are a strong function of the decommissioning schedule. Extension or compression of decommissioning schedule would increase or decrease manpower costs which represent a large component of the total decommissioning cost.

4. Recent Experience from Shutdown Plant

We recommend that the draft report incorporate, to the extent possible, the recent experience gained in estimating decommissioning costs for the Yankee and Trojan Nuclear plants. In our opinion, these plant specific estimates would provide good benchmarking data points. For example, the draft report assumes less staff to perform decommissioning tasks compared with the experience from Shippingport, Shoreham, Ft. St. Vrain and Yankee. We believe such comparisons could make draft report estimates more realistic.

5. Nuclear Insurance:

We recommend that the spent nuclear fuel storage insurance costs be included in the decommissioning costs. The utilities are expected to hold title to spent fuel during the decommissioning period which would result in incurring nuclear insurance costs.

6. TLG Comments:

PSE&G has also reviewed the detailed comments developed by TLG which were submitted to NRC on February 8, 1994. We concur with their comments and recommend incorporation into the draft report.