

NEI

RECEIVED
NUCLEAR ENERGY INSTITUTE

1994 NOV 15 PM 4: 46

RULES REVIEW & DIR. BR.
USNRC

John F. Schmitt
DIRECTOR
RADIOLOGICAL PROTECTION,
EMERGENCY PREPAREDNESS, &
WASTE REGULATION

DS09

November 15, 1994

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

⑥ - Mencinsky
59FR55299
11/4/94
①

SUBJECT: Request for Extended Comment Period for NRC Draft "Revised Analyses of Decommissioning for the Reference Boiling Water Reactor Power Station" NUREG/CR-6174

Dear Mr. Meyer:

On November 4, 1994, the *Federal Register* (59 FR 213) noticed the availability of draft NUREG/CR-6174, "Revised Analyses of Decommissioning for the Reference Boiling Water Reactor Power Station," Volume I & II. The *Federal Register* notice requests that comments be received by December 23, 1994. Our understanding is that copies for the public will not be available at the PDR until November 18, 1994. We agree that the decommissioning funding regulations need to re-evaluated, but there is not a sufficiently urgent need for this to justify such a limited public review schedule. The purpose of this letter is to request a sufficient review period.

Due to the importance of the decommissioning funding criteria, it is necessary that they be developed with sufficient time provided to allow interested parties an opportunity to comment and suggest changes or improvements. This has been done to date. Our understanding is that issuance of this study was delayed and the public comment period shortened in order to preserve an earlier schedule.

This results in a comment period which is inappropriately short making it difficult to develop carefully considered review and comment. The Nuclear Energy Institute (NEI)¹, on behalf of the nuclear industry requests an extension of the comment period to

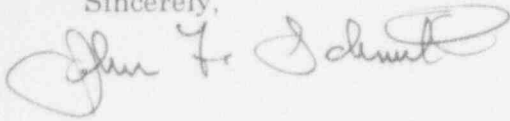
9411180064 941115
PDR NUREG
CR-6174 C PDR

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry. NEI is the successor organization to the Nuclear Management and Resources Council (NUMARC).

Mr. David L. Meyer
November 15, 1994
Page 2

January 20, 1995. We would appreciate your timely consideration and response to this important request. This is important because the approach and schedule for nuclear industry review is based on the comment due date. If you have any questions, please call me at (202) 739-8108 or Alan Nelson at (202) 739-8110.

Sincerely,

A handwritten signature in cursive script, appearing to read "John F. Schmitt". The signature is written in dark ink and is positioned above the printed name.

John F. Schmitt

JFS/APN:amw

c: Bill M. Morris