



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION I
 475 ALLENDALE ROAD
 KING OF PRUSSIA, PENNSYLVANIA 19406

Memo & the only:
Taylor
Russell

JUL 28 1988

*Point out TRS requires a
 reply to RI. Is Jim the
 lead p.s.? It appears to me
 that we should get next views
 & maybe offer a short comment, but
 not extensive*

MEMORANDUM FOR: Victor Stello, Jr., Executive Director
 for Operations

THROUGH: James M. Taylor, Deputy Executive Director
 for Regional Operations

FROM: William T. Russell, Regional Administrator,
 Region I

SUBJECT: VERMONT STATE LIAISON OFFICER REQUEST FOR NRC TO COMMENT
 ON SHUTDOWN ASSESSMENT OF THE VERMONT YANKEE NUCLEAR
 POWER FACILITY

During the July 6, 1988 meeting between Commissioner Carr and Vermont Commissioner Sterzinger for the Department of Public Service, the NRC was requested to comment on the subject report (enclosed), particularly with regard to decommissioning data and risk factors associated with nuclear facility accidents. Commissioner Carr stated that he would consider the request if resources were available. Commissioner Carr provided the report to Region I for coordination with NRC staff.

I believe that NRC should not comment on this report because it is a study addressing policy options for the State of Vermont and would require a substantial review by NRC to ensure the data was valid and with limited bias. On this basis, I am proposing to send a letter to the Vermont State Liaison Officer declining to comment on the Shutdown Assessment Report, but enclosing some resource documents. A copy of the proposed letter is enclosed. State, Local, and Indian Tribe Programs has concurred with this proposal, and my staff will inform George Felgate of Commissioner Carr's staff prior to responding to Vermont.

W. Russell
 William T. Russell
 Regional Administrator

Enclosures:
 As Stated

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 PDR ADOCK 05000271
 P PDC

EIO--003866

Victor Stello, Jr.

2

cc w/encl:
C. Kanmerer
G. Felgate



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
75 ALLENDALE ROAD
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DRAFT

JUL 28 1988

Mr. George Sterzinger
Commissioner
Department of Public Service
120 State Street, 3rd Floor
Montpelier, Vermont 05602

Dear Commissioner Sterzinger:

I appreciated the coordination you and members of your staff provided in support of Commissioner Kenneth Carr's meetings on July 6, 1988 with Governor Madeline Kunin and the various State officials on July 6, 1988 in Montpelier, Vermont. During the introductory meeting we had with you, you requested that the Nuclear Regulatory Commission comment on the interim report to the Vermont General Assembly entitled "Shutdown Assessment of the Vermont Yankee Nuclear Power Facility," dated December 1987.

Following a preliminary review of the document, we believe that it would be difficult for the NRC to comment on this report since it addresses policy options for the State of Vermont which are outside our responsibilities and expertise. Additionally, the interim report is expansive, and our commenting on the report would require substantial review resources.

I have however enclosed five resource documents which you may wish to consider in developing your final report. The first two documents, while related to the estimation of values and impacts of NRC regulations, may be of interest to you in providing an NRC view of cost benefit analysis. The first document, "Regulatory Analysis Guidelines of the U.S. Nuclear Regulatory Commission," provides the foundation upon which NRC bases its analyses. The second, "A Handbook for Value-Impact Assessment" provides examples of the types of costs and benefits to be included in NRC's Regulatory Impact Analyses. The third reference contains "Replacement Energy Costs for Nuclear Costs for Nuclear Electricity-Generating Units in the United States: 1987-1991." These costs are often the largest incurred when estimating the impacts of a regulation. The fourth, and perhaps the most relevant, is a transcript of NRC testimony concerning the shutdown of Indian Point Units 2 and 3. Also enclosed are the recent NRC amendments to its regulations which provide specific requirements for decommissioning of licensed nuclear facilities.

DRAFT

Mr. George Sterzinger

2

If any other documents could assist your effort, please contact me at
(215) 337-5246.

Sincerely,

Marie Miller
Regional State Liaison Officer

Enclosures:
As Stated