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Regulatory Improvements for Production and Utilization Facilities Transitioning to Decommissioning

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Submitter Information

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General Comment

Regulatory Analysis - Alternative DA-2 (Rulemaking to Require Fitness for Duty program elements that support IMP for power reactors)

Does the analysis account for the number of reactors at each site and thus the amount of fuel in the spent fuel pool and number of staff that would need to support decommissioning? For example, does the fuel in the pool at a 3 unit site take more staff and more time to move to dry storage.

Does the analysis account for second license renewals? If not, then the savings of the rule decreases because decommissioning at these sites would be delayed for another 20 years.

The rest of the values in Figure 15 for the rulemaking option for FFD are unverifiable because there is no transparency in the assumptions, just some low/most likely/high plug numbers on page B-7 without a basis. It is impossible to evaluate the information that went into these values and therefore they are meaningless. They should not be factored into the analysis unless full supported.

One item on page B-7 stands out, "industry one-time cost (pre-access drug and alcohol testing) per NPP." Why would NRC estimate any change from existing decommissioning site operations? NRC hasn't proposed any changes to the pre-access drug testing requirements.

In summary. The basis for justifying a reduction in requirements is largely due to the savings to the plants in decommissioning by stripping away the majority of the FFD program requirements for individuals with protected area only access. This assessment does not reflect those changes in any reasonable level of detail and does not credibly support moving forward with the proposed rule changes.