



November 28, 2022

Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

The Decommissioning Plant Coalition¹ (DPC) is pleased to comment on the Proposed Rule on Part 71, "Harmonization of Transportation Requirements with International Atomic Energy Agency Standards"; Docket NRC-2016-0179; 87FR55708 issued September 12, 2022.

We have concerns with the Proposed Rule's approach regarding Issue #9 on aging effects. We believe the scope of any Part 71 aging related requirement should be limited to the transportation cask's CoC and not applied to canister systems. As currently proposed, we see the canister systems could become subject to two different sets of aging management regulations. There are aging management requirements specific to the transportable storage canister addressed in the storage CoC. SNF/GTCC canisters licensed for transport are monitored by the storage certificate's aging management program. The focus of any transportation aging related harmonization involving SNF/GTCC systems should be based on a documented safety concern, safety analysis and limited to the transport cask. We recommend either changing the definition of package to include only the transportation package or credit existing aging management programs in the evaluation of the effects of aging in the proposed rule. In any event, we believe this provision requires further work to avoid unintended consequences in our aging management programs.

¹ The DPC was established in 2001 out of the recognition that the overwhelming attention of the regulator, the industry, and policy makers would be focused on the operating fleet and provides a forum for the identification of federal policy and regulatory issues of unique or special concern to decommissioning civilian nuclear facilities. Since its inception, plants that have been represented in the work of the DPC include charter members Dairyland (WI), Connecticut Yankee (CT), Rancho Seco (CA), Maine Yankee (ME), Yankee Rowe (MA), Humboldt Bay (CA), and joined by Big Rock (MI), Crystal River (FL), San Onofre (CA), Vermont Yankee (VT), Zion (IL), Kewaunee (WI), and Ft. Calhoun (NE). Other Entergy, Exelon, and PG&E plants have participated via their specific sites' memberships. Our primary goal remains to hasten the day when the spent fuel stored on-site will be successfully removed and no longer our companies' liability. The importance of that goal cannot be overstated. Several of our companies are simply awaiting the fulfillment of that goal to go out of business.

We would be pleased to work with staff on this matter. Please contact me or Mr. Michael Callahan with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Wayne Norton", with a stylized flourish at the end.

Wayne Norton
President Maine Yankee, Connecticut Yankee, and Yankee Atomic Electric Co.
Executive Spokesperson, DPC

From: [Mike Callahan](#)
To: [RulemakingComments Resource](#)
Subject: [External_Sender] DPC comment on the Proposed Rule on Part 71, "Harmonization of Transportation Requirements with International Atomic Energy Agency Standards"; Docket NRC-2016-0179; 87FR55708 issued September 12, 2022.
Date: Monday, November 28, 2022 1:35:02 PM
Attachments: [HarmonizationDPC.wan.pdf](#)

Please find attached a comment of the Decommissioning Plant Coalition regarding the subject proposed rule.

Thank you,

Michael S. Callahan
Governmental Strategies Inc (on behalf of the Decommissioning Plant Coalition)