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Draft Interim Staff Guidance: Use of the Decommissioning Trust Fund During Operations for Major Radioactive Component Disposal

Comment On: NRC-2023-0111-0001

Draft Interim Staff Guidance: Use of the Decommissioning Trust Fund During Operations for Major Radioactive Component Disposal

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Submitter Information

Name: Paul Saunders

Address:

Archer, FL, 32618

Email: paulsaunders2002@gmail.com

General Comment

While I understand the intent of controls associated with, and the potential for abuse of DTFs by utilities, I believe the Commission has overlooked one important factor. If the intent is to ensure sufficient funds are available for decommissioning the reactor at end of service life, it would be prudent to allow disposition of MRCs using DTF prior to entering into decommissioning. The DTF would ultimately be used to disposition residual MRCs that aren't dispositioned as a "cost of doing business" during plant operations. In my 50+ years in the nuclear waste industry, the cost for any service, and particularly related to size reduction, transport and disposal, has never decreased and most recently, costs have increased dramatically. Therefore, it is clear that supporting near-term use of DTF for MRC disposition would be a more cost-effective use of the DTF, by default resulting in better use of the delta funds during future decommissioning efforts.