

PUBLIC SUBMISSION

SUNSI Review Complete
Template=ADM-013
E-RIDS=ADM-03
ADD: Shawn Harwell,
Mary Neely

Comment (7)
Publication Date:
6/21/2023
Citation: 88 FR 40337

As of: 8/24/23, 8:48 AM
Received: August 21, 2023
Status: Pending_Post
Tracking No. lll-c552-8h74
Comments Due: August 21, 2023
Submission Type: Web

Docket: NRC-2023-0111

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

Document: NRC-2023-0111-DRAFT-0008

Comment on FR Doc # 2023-13093

Submitter Information

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General Comment

Please see attached letter for comment details.

Attachments

RS-23-088 Comments on DTF ISG for MRC Disposal



RS-23-088

August 21, 2023

Office of Administration
Mailstop: TWFN-7-A60M
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Program Management, Announcements, and Editing Staff

Subject: Comments on Draft Interim Staff Guidance on the Use of the Decommissioning Trust Fund During Operations for Major Radioactive Component Disposal (Docket ID NRC-2023-0111)

- References:
1. Draft Interim Staff Guidance on the Use of the Decommissioning Trust Fund During Operations for Major Radioactive Component Disposal, dated June 13, 2023 (ADAMS Accession No. ML23150A051)
 2. Letter from B Montgomery (NEI) to NRC, "Draft Interim Staff Guidance: Use of the Decommissioning Trust Fund During Operations for Major Radioactive Component Disposal (Docket ID NRC-2023-0111)," dated August 21, 2023

Submitted via Regulations.gov

Constellation Energy Generation, LLC (CEG) appreciates the opportunity to provide feedback on the Nuclear Regulatory Commission (NRC) draft Interim Staff Guidance (ISG) (Reference 1) on the use of the decommissioning trust fund (DTF) during operations for major component disposal.

The proposed guidance is a positive step towards providing licensees clarity with respect to NRC expectations when reviewing exemptions related to use of decommissioning trust fund during operations for disposal of major radioactive components (MRCs). CEG agrees with the comments submitted by the Nuclear Energy Institute (NEI) on August 21, 2023 (Reference 2). Specifically, the general robustness of the trust funds across the industry would merit case-by-case consideration of an exemption to allow the use of the DTF for this purpose while providing reasonable assurance of continued availability of adequate decommissioning funding .

CEG also supports the clarifications and improvements suggested by NEI to ensure that the guidance can be used most effectively and efficiently by licensees.

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U.S. Nuclear Regulatory Commission
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If you have any questions or require additional information, please contact Rebecca Steinman at (779) 231-6162.

Respectfully,

David Gullott
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Constellation Energy Generation, LLC

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