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December 3, 2014

The Hon. Allison M. Macfarlane
Chairman
U.S. Nuclear Regulatory Commission
Rockville, MD 20852-2738

Subject: Industry Perspective on Integrated Rule-Making for Decommissioning

Project number: 689

Dear Chairman Macfarlane:

We understand the Commission has requested the NRC staff to provide its views on the need for an integrated rulemaking for the transition to decommissioning and, as appropriate, provide the potential schedule and resources required for completion. On behalf of the commercial nuclear industry, we would like to express our support for integrated rulemaking as a longer term priority following the completion of regulatory actions to address plants that are currently transitioning to a decommissioned status.

The plants currently in process merit the full and undivided attention of NRC's decommissioning resources. This is vital to ensure that funds set aside for decommissioning are judiciously applied and are not used unnecessarily while needed licensing actions are under review. The NRC's efficiency in this regard is critical.

An integrated rule on the transition to decommissioning would provide a stable, more efficient regulatory framework for future plant decommissioning activities. This rule would also benefit from the insights gained from the current decommissioning transition activities. The integrated rule should address all of the regulatory requirements relevant to the transition from operating to decommissioned status. These requirements should include, at a minimum, emergency preparedness, security, and requirements governing certified fuel handler training. The integrated rulemaking should also address each of the key milestone conditions, such as fuel out of the reactor vessel and in the spent fuel pool, post-zirconium fire feasibility period with fuel still in the spent fuel pool, and finally all fuel in dry storage.

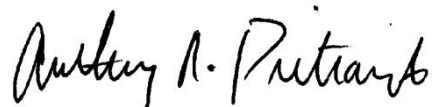
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In summary, the industry believes that an integrated rulemaking that incorporates the lessons learned from the current decommissioning transition activities and addresses the regulatory requirements associated with the transition from operating to decommissioned status would provide the most efficient and effective regulatory framework. Prior to commencing that rulemaking effort, the NRC should focus on the effective review of current decommissioning transition licensing actions.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony R. Pietrangelo". The signature is written in a cursive, slightly slanted style.

Anthony R. Pietrangelo

c: The Honorable Kristine Svinicki
 The Honorable William Ostendorff
 The Honorable Jeff Baran
 The Honorable Stephen Burns
 Michael Johnson, NRC DEDO
 William Dean, NRC NRR