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Stephen A. Byrne
Senior Vice President, Nuclear Operations
803.345.4622

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USNRC

Secretary
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attention: Rulemakings and Adjudications Staff

January 15, 2002 (3:08PM)
OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Dear Sir:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
SOUTH CAROLINA ELECTRIC & GAS COMPANY
COMMENTS ON ENTOMBMENT OPTIONS FOR POWER
REACTORS (Ref. October 16, 2001, Federal Register 66-52551)

South Carolina Electric & Gas Company (SCE&G) has the following comments concerning entombment options for power reactors.

- A.1 The existing regulation needs no improvement.
- A.2 The existing regulation needs no improvement.
- A.3 The existing regulation should be revised to allow an agreement state to control the on-site radioactive material by license and then terminate the NRC operating license.
- A.4 This new part should consider the transfer of authority to an Agreement State and termination of the NRC license.
- A.5 No comment.
- A.6 SCE&G wishes to propose another option, decommissioning a nuclear reactor site by entombment to a brown field condition instead of an unrestricted release of land to the public. The company proposes this option so that other company uses of land already purchased for the nuclear reactor may be implemented. Once the entombed structure is proven to reduce radiation levels to current 10CFR20 subpart E release limits by survey, the NRC operating license should be terminated.

The NRC should then consider the use of agreement states for licensing the site. Currently, South Carolina Department of Health and Environmental Control under a radiation material license controls our removed steam generators. This option would allow for entombment of GTCC waste.

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Secretary, USNRC

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B.1 Dose reduction by shielding is a common practice. Credit for engineered barriers should be continued for a decommissioned reactor to safely allow for license termination.

C.1 GTCC waste is already in the safest place possible, inside the reactor vessel. The dose received as this waste is cut up, and potential danger to the public as it is trucked to a special disposal site is neither ALARA, nor warranted when there is another alternative. Therefore, SCE&G believes this waste should be considered in the entombment approach.

D.1 Agreement states should be permitted to license an entombed power reactor.

D.2 No comment.

D.3 No comment.

D.4 No comment.

E.1 No comment.

E.2 No comment.

Very truly yours,



Stephen A. Byrne

CAC/SAB/dr

c: N. O. Lorick
N. S. Carns
T. G. Eppink
R. J. White
R. R. Assa
W. R. Higgins
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