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**From:** "Hickey, Eva E" <eva.hickey@pnl.gov>  
**To:** "mtm2@nrc.gov" <mtm2@nrc.gov>, "sxf@nrc.gov" <sxf@nrc.gov>  
**Date:** 1/15/02 6:25PM  
**Subject:** FW: Comments on NUREG-0586 Draft Supplement 1

-----Original Message-----

From: Jerry Delezinski [mailto:JDeleze@smud.org]  
 Sent: Tuesday, November 20, 2001 11:12 AM  
 To: 'dgeis@nrc.gov'  
 Subject: Comments on NUREG-0586 Draft Supplement 1

Cynthia Carpenter, Chief  
 Rules and Directives Branch  
 Division of Administrative Services  
 U.S. Nuclear Regulatory Commission

Re: Comments on NUREG-0586 Draft Supplement 1

Ms. Carpenter:

We would like to comment on the draft NUREG to correct an error in Table 4-3, line 21 regarding the Cost Impacts of Decommissioning for Rancho Seco. Line 21 should read:

Rancho Seco      913MWe   PWR   DECON      \$394

Please refer to our letter submitted to the NRC Document Control Desk dated 3/26/01 entitled Rancho Seco Report on Decommissioning Funding Status. On page 2 of the letter we stated:

"...Their [TLG] estimate was \$495.4 million in 2000 dollars. The portion of this total that is non NRC-defined decommissioning activities related to non-radiological dismantlement and management and storage of spent fuel is \$101 million, most of which is related to fuel storage costs..."

2000

...TABLE 2...  
 \$495 Million.....

SMUD, when it first established its decommissioning fund, included radiological dismantlement costs and costs related to storing spent fuel. Therefore, \$495m -\$101m leaves \$394 million for equivalent cost discussed in Table 4-3 of the NUREG.

Since 1999, Rancho Seco has embarked on an extended DECON process scheduled for completion in 2008 (including license termination). After license termination, SMUD will, depending on its business needs, embark on sit restoration currently estimated at ~\$45-80 million. This approximate estimate dollar figure was never a part of the decommissioning trust fund. (We assume your number in Table 4-3 includes all the costs of dismantlement, fuel storage and non-radiological site restoration.)

Also, based on information presented in various industry forums, several

Template = ADM-013

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 Add = M. Masnik (MTM2)

numbers quoted for some of the other plants may be inaccurate. Each plant should verify the numbers for accuracy.

Thank You,

Respectfully,

Jerry Delezenski,  
Supt. QA/Licensing/Admin  
Rancho Seco