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**Date:** 1/29/02 2:46PM  
**Subject:** Comments on Draft Reg Guide DG-1085, Draft NUREG-1713

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Please find attached a letter from Detroit Edison Fermi facility entitled: "Comments on Draft Regulatory Guide DG-1085, 'Standard Format and Content of Decommissioning Cost Estimates for Nuclear Power Reactors', and Draft NUREG-1713, 'Standard Review Plan for Decommissioning Cost Estimates for Nuclear Power Reactors'.

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Rules and Directives Branch  
Office of Administration  
U.S. Nuclear Regulatory Commission  
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Subject:       Comments on Draft Regulatory Guide DG-1085, "Standard Format and  
Content of Decommissioning Cost Estimates for Nuclear Power Reactors",  
and Draft NUREG-1713, "Standard Review Plan for Decommissioning Cost  
Estimates for Nuclear Power Reactors"

Detroit Edison appreciates the opportunity to comment on the two subject draft documents concerning decommissioning cost estimates. Detroit Edison does not recognize the need for these documents, but appreciates that the documents clearly differentiate the levels of detail needed for the decommissioning cost estimates required at specific regulatory milestones. Because other assumptions may be more appropriate for comprehensive financial planning, Detroit Edison also appreciates that the guidance does not apply to decommissioning cost estimates prepared for other purposes, such as decommissioning fund planning for licensee or public service commission use.

The specific comments, which follow, apply to both Regulatory Guide DG 1085 and the Standard Review Plan (SRP), where the topic is covered in both documents.

The description combination of decommissioning methods referred to as deferred dismantlement in the draft Regulatory Guide is called DECON in the SRP. Deferred dismantlement seems to be more appropriate terminology for the four phases described.

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"DECON", is a specific decommissioning method and so is not the best terminology to be used for a combination of methods.

The decommissioning cost formula in 10 CFR 50.75 (c) only applies to BWRs and PWRs. This should be clarified. The documents do appropriately allow acceptance of estimates that differ from generic if justification is provided. The type and size of a reactor can lead to different decommissioning costs.

The need for a separate sub-account in the nuclear decommissioning fund for items other than those meeting the NRC definition of decommissioning cost (e.g. for spent fuel storage) can unnecessarily lead to increased administrative costs for fund management. The amount for each can be tracked separately by the fund trustee, without separate sub-accounts being maintained.

Regarding the preliminary cost estimate, normally submitted five years before the projected end of operations, the guidance states that the preliminary cost estimate should be submitted at the same time as the certification of permanent shutdown if a plant prematurely shuts down more than five years prior to the expiration of its operating license. This expectation goes beyond the regulatory requirement and could unnecessarily delay the certification of permanent shutdown if a cost estimate has not previously been performed that includes the six items covered in the Reg. Guide. Since these items include the decommissioning option expected to be selected and the preliminary decommissioning schedule, this information may not be contained in an existing cost estimate, nor immediately available to meet the requirement for submittal of the certification within 30 days of the permanent shutdown decision. The time for preparation and review of this information would be expected to exceed 30 days.

The guidance discusses that submittal of the PSDAR, with its cost estimate, would also satisfy the requirements for submittal of the preliminary cost estimate, if the PSDAR is submitted with the certification of permanent shutdown for a plant prematurely shut down. The NRC should clarify whether the guidelines for information to be included in the preliminary cost estimate need to be included in the PSDAR cost estimate in these circumstances. For some of the allowable options for the PSDAR cost estimate, that information is not needed. As written, the guidance implies that the PSDAR cost estimate would not need to be supplemented to cover all six of the items that are supposed to be included in the preliminary cost estimate.

It should be acceptable for the low level waste (LLW) costs to be combined, rather than split into separate packaging, shipping and burial/waste vendor components. The latter will typically be the dominant factor. Also, it should be acceptable for LLW packaging cost to be included in radiological D&D cost, if the cost estimate includes material handling to be part of the system removal cost.

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The text describes three phases of SAFSTOR that the cost estimate should be separated into; however, the suggested format in the table shows four phases.

Use of the EPRI cost estimate program should be acceptable if the generic cost estimate option is selected for the PSDAR decommissioning cost estimate.

In the discussion of what the generic cost estimate should consist of, the third bullet should have "if needed" added at the end to be consistent with other sections of the guidance. The cost of items not considered part of decommissioning should be listed separately, if included, but the guidance should not imply that they should be included in a listing. This comment also applies to the description of the general information to be included in the site specific cost estimate contained in Section 3.1 of the Reg. Guide.

"In this section " should be deleted from the fifth sentence in the second paragraph of Section 3 of the Reg. Guide. Suggested tabular formats are not shown later in this section.

The guidelines state the licensee should submit its decommissioning work schedule as part of the site specific cost estimate. The reason given is so the NRC can schedule inspection resources. Detroit Edison agrees that the licensee should communicate with the NRC so that inspections can be appropriately planned. However, this does not justify why the schedule is to be submitted as part of the cost estimate. The regulatory requirement is for a cost estimate, not submittal of the decommissioning work schedule. If the final guidance will continue to include the decommissioning work schedule as part of the cost estimate, the guidance should clarify that the work schedule to be submitted is at a summary level of detail, rather than a detailed decommissioning work schedule.

Section 3.2 of the Reg. Guide describes items to be included in the site specific decommissioning cost estimate as part of the description of the overall decommissioning project. The first item listed is a detailed work breakdown that describes all the activities to be performed, including planning and preparation. The description should be revised to state that this is a summary level of detail. It would be burdensome to include a detailed breakdown that includes all activities. Such a breakdown would be likely to change as the project progresses and would be of little value, unless prepared at a summary level.

Section 3.3 of the Reg. Guide provides guidance for the detailed schedule of all elements of the work breakdown. The description should be modified to delete the word "all", since the schedule, if it continues to be expected as part of the cost estimate, should be at a summary level. The specific bulleted items are generally at a summary level, though some are quite specific, especially some of those listed for SAFSTOR. This comment also applies to the corresponding section of the SRP.

The guidance requests that radwaste volume be provided, assuming no volume reduction. Detroit Edison recommends that the guidance allow volumes to be reported, either assuming

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volume reduction or not, as long as the cost estimate identifies that the estimated volumes include volume reduction if they do so.

The Reg. Guide states that all pages of text should be printed on both sides. Single sided printing should be allowed.

Detroit Edison suggests that an activity in the suggested format table for chemical decontamination that includes all cost aspects of this activity would be more useful than the one in the table provided that only includes energy costs for chemical decontamination.

The suggested format table for BWRs includes a line item for structural beams, plates and cable removal. This activity should also be included for PWRs.

In the Reg. Guide Table 7, "Typical Waste Burial Cost and Volumes", and the SRP, Tables 17 and 18, the word "other" should proceed "Dry Active Waste", since the other activities listed will also produce dry active waste.

The abstract for the SRP states that it will include guidance on evaluating decommissioning costs for PWRs and BWRs. The introduction of the SRP does not limit its scope to PWRs and BWRs.

There appears to be words missing from Table 1 of the SRP.

Section C of the SRP refers to individual SRPs for the different cost estimates. This nomenclature should be clarified. Each cost estimate is included in a separate section of the SRP (NUREG-1713).

Section 1.4.1 of the SRP should be modified to state that the preliminary cost estimate is acceptable if it is greater than or equal to the decommissioning financial assurance requirement amount or adequate justification is provided as to why it is less. A small reactor may have a lower cost.

The description of what items should be included in the preliminary cost estimate is more detailed in the SRP than in the Reg. Guide. For example, the SRP has the reviewer expecting costs for LLW; however, the Reg. Guide does not give guidance to separate out LLW costs at the preliminary cost estimate stage. The Reg. Guide guidance provides for LLW costs to be reported separately in later, more detailed, cost estimates. Note that the tables in the SRP for the preliminary cost estimate are consistent with the Reg. Guide.

Per footnote "a", Table 5 of the SRP, NUREG/CR-5884 is Ref 5, but it is the eleventh reference in the unnumbered reference list. The reference number for NUREG/CR-6174 in Table 6 is also incorrect.

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Figure 1 in the SRP, entitled "Representative Schedule of Major Decommissioning Activities", does not appear representative as compared to time periods contained in Tables 5 and 6 and the assumption used elsewhere in the SRP to perform cost planning based on full term license operations.

On page 32 of the SRP, the wording, "generic cost estimate" is used throughout the section (Section 3) on the site-specific cost estimate.

The review procedure in the SRP for the LTP cost estimate states that the reviewer should confirm the cost estimate does not account for items outside the scope of the decommissioning process. Since the LTP cost estimate is an update of the site specific decommissioning cost estimate, and the Reg. Guide allows the site specific cost estimate to include items not considered part of decommissioning if listed separately, the review procedure for the LTP cost estimate should also have an allowance for such items to be included if clearly identified as costs in addition to decommissioning costs.

While Detroit Edison has commented above that activities such as spent fuel storage that do not meet the definition of decommissioning should be allowed to be included in the cost estimates if identified separately, Detroit Edison does not think such costs should be required to be included in any NRC required decommissioning costs estimate.

If there are any questions on these comments, please contact Ms. Lynne Goodman at 734-586-1205.

Sincerely,

W. T. O'Connor  
Vice President, Nuclear Generation

WTO/LSG/ljd

cc: S. W. Brown  
E. Kulzer (NRC Region III)  
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