



CONNECTICUT YANKEE ATOMIC POWER COMPANY

HADDAM NECK PLANT

362 INJUN HOLLOW ROAD • EAST HAMPTON, CT 06424-3099

May 2, 2013
CY-13-027

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

ATTN: Rulemakings and Adjudications Staff

Connecticut Yankee Atomic Power Company
Haddam Neck Plant Independent Spent Fuel Storage Installation
NRC License No. DPR-61 (NRC Docket Nos. 50-213 and 72-39)

Subject: Comments on Station Blackout Mitigation Strategies (10 CFR Parts 50 and 52) Draft
Regulatory Basis and Rule Concepts Document -- Docket ID NRC-2011-0299

Connecticut Yankee Atomic Power Company (Connecticut Yankee) appreciates the opportunity to comment on the subject Station Blackout Mitigation Strategies (10 CFR Parts 50 and 52) Draft Regulatory Basis and Draft Rule Concepts document (Reference 1) associated with the potential amendment of Nuclear Regulatory Commission regulations concerning nuclear power plant licensees' Station Blackout Mitigation Strategies.

The draft document does not address stand-alone 10 CFR 50 licensees that have permanently ceased operations, fully decommissioned and dismantled the former operating plant, and are storing spent nuclear fuel and Greater than Class C (GTCC) waste in a dry cask Independent Spent Fuel Storage Installation (ISFSI). Connecticut Yankee's position is that the Draft Regulatory Basis document and subsequent rulemaking are not applicable to 10 CFR 50 licensees where the operating reactor and the power plant have been completely decommissioned and the licensee only operates a dry storage ISFSI at the former reactor site.

Accordingly, Connecticut Yankee requests that the final regulatory basis document and future development of the Station Blackout Mitigation Strategies rulemaking clearly delineate that it applies to holders of, or applicants for, an operating license under 10 CFR 50, except those; 1) 10 CFR 50 licensees who have permanently ceased operations, 2) certified that fuel has been permanently removed from the reactor vessel, and 3) removed all fuel from the spent fuel pool.

This letter contains no regulatory commitments.

If you have any questions regarding this submittal, please do not hesitate to contact me at (860) 267-6426 ext. 303, or at bbuerger@3yankees.com.

Respectfully,



Brantley Buerger, P.E.
ISFSI Manager

Reference:

1. NRC request for comments on Station Blackout Mitigation Strategies (10 CFR Parts 50 and 52) Draft Regulatory Basis and Rule Concepts (Federal Register Notice 21275-21276)
- cc: NRC Document Control Desk
W. M. Dean, NRC Region I Administrator
M. S. Ferdas, Chief, Decommissioning Branch, NRC, Region 1
J. Goshen, NRC Project Manager, Haddam Neck