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Ms. Annette L. Vietti-Cook
Secretary
U. S. Nuclear Regulatory Commission
Attn: Rulemaking and Adjudications Staff
Washington, DC 20555-0001

**SUSQUEHANNA STEAM ELECTRIC STATION
COMMENTS ON THE NRC ADVANCED NOTICE
FOR PROPOSED RULEMAKING FOR 10 CFR
PART 20, "RADIATION PROTECTION"
DATED JULY 25, 2014 – DOCKET ID NRC-2009-0279
PLA-7352**

**Docket Nos. 50-387
and 50-388**

On July 25, 2014, an Advanced Notice for Proposed Rulemaking (ANPR) was published in Federal Register Notice (79 FR 43284) docketed (Docket ID NRC-2009-0279) to revise the Nuclear Regulatory Commission's regulation in 10 CFR Part 20, "Radiation Protection," and requested comments by November 24, 2014.

On November 20, 2014 a Federal Register Notice (79 FR 69065) extended the comment period to March 24, 2015. On March 18, 2015 a Federal Register Notice (80 FR 14033) provided another extension of the comment period to June 22, 2015.

Talen Energy endorses the Nuclear Energy Institutes' (NEI) March 24, 2015 letter written on behalf of the nuclear energy industry and recommends that the NRC not make the changes proposed in the ANPR because they are unnecessary with no cost-benefit, providing little to no improvement in the health and safety of workers, the public or the environment.

Talen Energy concurs with the position as stated in the SRM-SECY-08-0197 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML090920103) that current standards continue to provide adequate protection of the health and safety of workers, the public and the environment.

Talen Energy also concurs with the NRC that the recommendations contained in International Commission on Radiological Protection (ICRP) Publication 103 (ADAMS Accession No. ML12089A654) propose measures that go beyond what is needed to provide adequate protection.

Talen Energy agrees with NEI that the nuclear industry's current operating practices protect workers, the public and the environment far beyond regulatory requirements for the nuclear energy industry.

Furthermore, Talen Energy believes that the cumulative effect of regulation (CER) resulting from the changes described in the ANPR for 10 CFR Part 20 will place substantial resource burdens on nuclear energy licensees with little or no additional protection of the public. This burden will be further compounded should the potential changes proposed by the U. S. Environmental Protection Agency in the February 2, 2014 ANPR for 40 CFR Part 190 and the changes proposed in the anticipated publication of the ANPR for Part 50, Appendix I, be imposed on licensees.

In summary, Talen Energy recommends that no changes be made to the existing regulations because (1) existing standards remain protective of occupational workers, public health, and the environment; (2) the recommendations contained in ICRP Publication 103 propose measures that go beyond what is needed to provide adequate protection; (3) the nuclear industry's current operating procedures and practices protect occupational workers, the public and the environment far beyond the regulatory requirements for the uranium fuel cycle; and (4) the CER will place substantial burden on licensees with little or no benefit.

Please contact Mr. Jeffery Grisewood, Manager – Nuclear Regulatory Affairs at (570) 542-1330 if there are any questions concerning this letter.

This letter contains no new regulatory commitments.



by A. FRANK, FOR

T. S. Rausch

Copy: NRC Region I (Attn: Chief, Emergency Preparedness Branch – DRS)
Mr. B. Fuller, PA DEP/BRP
Mr. J. E. Greives, NRC Sr. Resident Inspector
Mr. J. A. Whited, NRC Project Manager