



Portland General Electric Company

DSI-24
(22)

Stephen M. Quennoz
Trojan Site Executive



November 27, 1996

VPN-078-96

Trojan Nuclear Plant
Docket 50-344
License NPF-1

Mr. John C. Hoyle
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Attn: Chief of Docketing Service Branch
Washington, D.C. 20555-0001

Dear Sir:

Nuclear Regulatory Commission Issue Paper Comments

The purpose of this letter is to provide Portland General Electric's (PGE) comments on Direction-Setting Issue (DSI) 24, Decommissioning - Power Reactors.

Due to the early decommissioning of the Trojan Nuclear Plant, PGE is in a unique position to provide experience based comments. PGE concurs with Option 1 and feels that significant progress has been made with the approval of the new decommissioning rule (10 CFR 50.82). There are still several regulatory impediments remaining to the safe and cost effective decommissioning of a power reactor site which are discussed below.

1. Significant reductions in personnel exposure and conservation of vital decommissioning funding can be achieved by removing and disposing intact, large reactor plant components such as reactor vessels with internals which require transport as a Type B package. In order to transport these components to disposal sites they must be modified to meet the packaging and transportation requirements of 10 CFR 71. Current regulations are written to address multiple use fuel casks or other packages containing high levels of releasable contamination by various shipment methods including commercial transportation routes. As a result of this broad applicability, rigid interpretation of the current regulations can be overly restrictive when attempting to license large reactor plant components that contain limited quantities of releasable radioactive material and are transported as one time shipments under stringent transportation controls.

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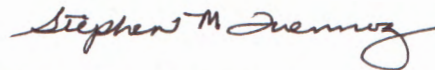
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Current regulations (10 CFR 71.41(c)) allow the Commission to approve environmental and test conditions different than those specified if the shipper can demonstrate adequate controls will provide equivalent safety of the shipment. Clear guidance should be provided to the NRC staff to support the licensing and transportation of large reactor plant components as Type B packages. This support would significantly assist in keeping decommissioning exposure as low as reasonably achievable, conserve vital decommissioning funding, and maintain or improve public safety through the use of strict transportation controls and reduced shipments.

2. Regulations do not currently address the disposal of greater than class C (GTCC) waste or mixed waste. Lacking regulatory guidance for disposal, facilities are required to store these wastes on site precluding final decommissioning and site restoration. Regulations should be developed to address the disposal or off-site storage of these types of waste.

Sincerely,



Stephen M. Quennoz
Trojan Site Executive

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