



COOPERATIVE

FILE NUMBER
PROPOSED RULE PR-30, 40, 50 et al (130)
(50 FR 5600)

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July 12, 1985

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JAMES W. TAYLOR
General Manager

In reply, please
refer to LAC-11017

United States Nuclear Regulatory Commission
Office of the Secretary
Washington, DC 20555

DOCKETED
USNRC

Attention: Docketing and Service Branch

'85 JUL 12 P3:14

Gentlemen:

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

SUBJECT: Comments on the Proposed Decommissioning Rule;
Docket No. 50-409

Dairyland Power Cooperative, Licensee for the La Crosse Boiling Water Reactor (LACBWR), a 50 MWe BWR, hereby states its opposition to the Commission's proposed rule for the establishment of reserve funds for reactor decommissioning.

The proposal to establish a fixed sum of \$100,000,000 per reactor for decommissioning purposes is inappropriate. This level of cost assumes that all reactors, both large and small, have the same decommissioning requirements. We believe that small nuclear reactor plants may be more easily decommissioned due to smaller disposal volumes, smaller surface decontamination requirements, and the handling of smaller and lighter weight components. Therefore, a small reactor plant, such as LACBWR, should be permitted to accumulate a lesser amount in anticipation of its decommissioning costs.

Dairyland Power, therefore, specifically requests that the proposed rule be amended to allow small reactor plants (under 100 MW) to provide a decommissioning fund in the order of \$20,000,000 (1985 dollars) rather than the full \$100,000,000 fund.

Accumulation of a decommissioning fund at the \$100,000,000 level proposed imposes an undue financial burden on the operators of small nuclear reactor plants. Further, the application for an exemption with the attendant processing, legal, and consultant fees is a time consuming and expensive process in order to obtain relief from such an unfair rule.

Your consideration of this request prior to the promulgation of the rule is, in our opinion, in the public interest.

Sincerely,

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PDR PR
30 50FR5600 PDR

JWT/ajm

Keith G. Stayer, 113055

Catherine R. Mattsen, 113055

Robert Wood, AR-5037

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JUL 12 1985

Acknowledged by card.