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November 27, 1996

Robert S. Wood
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Initial Comments on Draft NRC Policy Statement Regarding Availability of
Decommissioning Funding

Dear Sir:

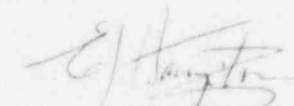
As a result of an initial review of the draft policy, I offer the following comment:

The NRC appears silent on the issue of the timing of licensee funding dedicated for decommissioning activities. The policy, in concert with existing 10CFR50 requirements, documents acceptable methods of financially secure instruments to hold decommissioning funds, however these instruments may embed contractual timing limitations regarding access to these funds. A licensee's premature entry into decommissioning, for whatever reason, may freeze these dedicated funds for an extended duration. This delay could adversely impact a timely decommissioning sequence, and potentially affect the health and safety of the public.

It is therefore recommended that NRC add explicit wording to the policy statement that informs licensees of the NRC's right to assess the timing and liquidity of decommissioning funds.

I expect to perform a more detailed review of the policy over the next few days, and I will inform you of any additional comments as they become defined.

Sincerely,



Edward John Hampton, Ph.D., PEI
President and CEO

EJH/jg

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