DSI-24
(5)

STATE OF MICHIGAN

JOHN ENGLER, Governor
DEPARTMENT OF ENVIRONMENTAL QUALITY
HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973
RUSSELL J. HARDING, Director

REPLY TO:
DRINKING WATER & RADIOLOGICAL
PROTECTION DIVISION
3423 N MARTIN L KING JR BLVD
PO BOX 30630
LANSING MI 48909-8130

November 5, 1996

Mr. John C. Hoyle
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

ATTN: Chief of Docketing and Services Branch

Dear Mr. Hoyle:

We have received the U.S. Nuclear Regulatory Commission (NRC) request for stakeholder views on NRC's 16 direction-setting issues as part of NRC's initiative for Strategic Assessment and Rebaselining.

My staff have selected 6 of the 16 direction-setting issue papers to provide our preliminary comments for your consideration. The comments are presented issue-by-issue and focus on the various options that NRC has described for each issue. These issues and associated preliminary comments were selected on the basis of their potential significance from a Michigan-specific perspective as a non-Agreement State.

Should you have any questions concerning the enclosed comments, please contact Mr. David Minnaar, of my staff, in the Radiological Protection Section at 517-335-8198.

Sincerely,

Flint Watt

Flint C. Watt, P.E., Chief
Drinking Water and Radiological
Protection Division
517-335-9218

Enclosures

cc: Mr. David Minnaar, MDEQ
Mr. Richard L. Bangart, NRC
Mr. Charles M. Hardin, CRCPD

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DSI 24: Decommissioning - Power Reactors

Option 1: *Continue Current Direction and Approaches*

In the long term this option would provide a satisfactory solution to the decommissioning needs of Michigan's current nuclear power industry, provided that none of the state's five operating reactors at four plant sites experiences difficulty requiring premature shutdown. The current pace of rule-making appears to be adequate to accommodate the time schedule for decommissioning the Big Rock Point Plant that will reach end of plant life on May 31, 2000. Rule-making efforts now under way seem to address the major issues of decommissioning safety criteria, financial accountability, and radiation site release levels. Rule-making improvements now in process should provide sufficient public assurance of health and environmental protection during the various phases of decommissioning pending final disposal of both high and low-level radioactive waste and release of the former reactor sites for unrestricted or regulated use.

Option 2: *Pursue Current Direction and Approaches More Aggressively*

This option would be selectively preferred in Michigan to emphasize those rule-making initiatives that impact financial responsibility, dry cask storage safety and security for protection of the public and the Great Lakes, spent fuel and high-level waste shipment and disposal, and other issues of high public visibility and concern. These issues would become more significant and urgent in the case of premature shutdown of one or more of Michigan's nuclear plants.

Option 3: *Proceed More Slowly Implementing Current Direction and Approaches*

Although Michigan's oldest operating reactor is scheduled for decommissioning in less than four years, the remaining active reactors have a range of expected operation from approximately 15 to 30 years. Nevertheless, a serious unexpected technical, political, or economic event could force premature shutdown of one or more of Michigan's nuclear plants, necessitating immediate consideration of decommissioning. We believe it would not be in the best interest of Michigan's rate-payers, tax-payers, health, or environment to suggest any unnecessary delay in establishing the essential framework for safe and efficient decommissioning before encountering such circumstances. Therefore, this option is not supported, due to potentially unfavorable health, safety, environmental, and economic impacts.