



Carolina Power & Light Company

July 18, 1978

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PROPOSED RULE

PR-304050,70(43FR10370)

Secretary of the Commission
United States Nuclear Regulatory Commission
Washington, D. C. 20555
ATTENTION: Docketing and Service Branch

Dear Sir:

Federal Register Notice 7590-01 dated March 13, 1978, provided advance notice of a proposed rulemaking on decommissioning of nuclear facilities. The notice specifically invited advice and recommendations on several questions. Accordingly, Carolina Power & Light Company offers the following comments. It should be noted that these comments address the questions solely from the standpoint of decommissioning of nuclear power reactors.

Question 1:

Is it desirable to develop more definitive decommissioning criteria for production and utilization facility licenses and byproduct, source and special nuclear material licenses? If so, should the criteria be in the form of:

- A. potential exposures to individuals;
- B. numerical contamination limits;
- C. other?

Comment:

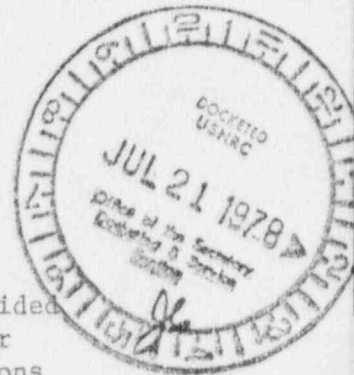
More definitive decommissioning criteria could be useful for both the NRC and the licensee. The development of more definitive criteria, however, should allow flexibility to incorporate the experience that will be gained as more large-scale power reactors are decommissioned.

Question 2:

Should detailed decommissioning plans be required prior to the issuance of licenses?

Comment:

Detailed decommissioning plans should not be required prior to the issuance of licenses for power reactors. Experience gained from other plants and advances in the state of the art of handling large radioactive components could render any detailed plan obsolete long before the end of the 40-year life of a power reactor.



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Question 3:

Should funding or other surety arrangements be required before the issuance of licenses for all cases? If not, which cases?

Comment:

We believe that it is neither necessary nor appropriate for the NRC to require utilities to post bond or other security to cover the costs of decommissioning. The specific method for funding this cost is only a part of the overall economic regulation of a utility which is subject to the expertise and jurisdiction of the Federal Energy Regulatory Commission and state utility regulatory commissions. Reasonable assurance of a utility's financial qualifications can be obtained from a utility's financial statements which are readily available in published annual reports.

Question 4:

What are acceptable criteria for residual levels of radioactivity on materials which can be released for unrestricted use?

Comment:

At present, we feel the residual levels of radioactivity specified in Regulatory Guide 1.86 are acceptable.

Question 5:

Proposals have been made to maintain reactors, which have been closed, in protective storage for lengthy periods of time to allow for radioactive decay prior to dismantlement. From the standpoint of determining the impact to future generations, what is an acceptable length of time, if any, after a facility operation ceases before the facility should be decommissioned?

Comment:

Unless there is some indication that extended periods of mothballing or entombing present an environmental or safety hazard, there seems to be no reason for specifying a minimum period of time by which decommissioning would have to be complete. Preliminary studies have not provided sufficient information to define the optimum period for mothballing or entombing prior to dismantling in order to minimize costs and doses. This again is an area which can benefit greatly from experience.

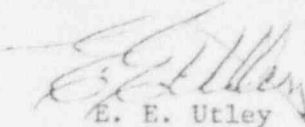
Question 6:

Should decommissioning criteria extend to buildings, structures, and components, which have not been contaminated with radioactive materials?

Comment:

The buildings, structures, and components not contaminated with radioactive materials should not be included in NRC decommissioning criteria inasmuch as they do not pose a threat to the health and safety of the public beyond that of any industrial structure no longer in use. The desirability of removal/dismantling of such structures and the timetable for doing so would depend heavily on the intended future use of the site.

Yours very truly,



E. E. Utley
Senior Vice President
Power Supply

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