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PROPOSED RULE PR-72(43FR 46309)

MEMORANDUM FOR: Russell Stanford  
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FROM: Arnold Abriss  
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and Safeguards

SUBJECT: PROPOSED 10 CFR PART 72



I would like to submit a comment on Proposed 10 CFR Part 72, Section 72.18 "Decommissioning Plan, including its Financing".

Proposed Section 72.18 of 10 CFR requests information to be included in the Decommissioning Plan for an ISFSI. However, there is no requirement for providing cost estimates for the various decommissioning operations. Estimated costs are necessary to properly select a funding mechanism to pay for decommissioning. I would therefore, suggest the following changes:

- (a) Insert the following statement after the first sentence, "The plan shall include cost estimates for implementing the decommissioning procedures, for decontaminating the site and for disposing of radioactive materials, including transportation and burial changes."
- (b) Add after "execution" based upon the cost estimates of part (a) above.

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