



Entergy Nuclear Operations, Inc.
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Steven Scheurich
Vice President,
Nuclear Decommissioning

CNRO-2016-0007

March 18, 2016

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

Subject: Comments on Advance Notice of Proposed Rulemaking, Regulatory Improvements for Decommissioning Power Reactors (Docket ID NRC-2015-0070)

Dear Sir or Madam:

Entergy Nuclear Operations, Inc. (Entergy) is providing this letter in response to the NRC request for comment on the Advance Notice of Proposed Rulemaking on Regulatory Improvements for Decommissioning Power Reactors. Entergy has been an active participant in the NRC and industry meetings regarding this topic and endorses the comments provided by the Nuclear Energy Institute (NEI).

With one facility entering decommissioning in 2015, and recent notifications that two additional facilities will permanently cease power operations, one by early 2017 and another no later than June 1, 2019, Entergy emphasizes the following key points, which are consistent with the NEI comments:

- During the rulemaking process, NRC staff should continue to review and issue site-specific exemptions, as requested by decommissioning licensees, from certain regulatory requirements that generally apply to an operating reactor. The exemption process is an established part of the NRC regulatory framework, and allows for appropriate consideration of the reduced risks of permanently shut down and defueled reactors as compared to operating reactors.
- NRC should continue to dedicate appropriate resources to ensure timely Staff review of site-specific licensing actions that will enable licensees to transition efficiently from operating to decommissioning status.
- To clarify regulatory requirements and to promote consistency within the industry, NRC should prioritize review and endorsement of NEI guidance documents recently submitted on: (1) use of the nuclear decommissioning trust fund; (2) managing personnel fatigue at decommissioning facilities; and (3) certified fuel handler training programs.
- NRC should move forward with an expedited, limited-scope rulemaking to codify the changes that are directly related to the NRC's stated primary objective which is to "reduce the number of licensing actions needed during decommissioning."

Accomplishment of a limited-scope rulemaking in a timely manner is necessary in order for the vision of the NRC's Project Aim (which sets forth a strong vision for making the agency more efficient) to be realized for decommissioning plants.

- The NRC's Principles of Good Regulation should continue to apply during decommissioning, which is an important phase in the life cycle of a commercial nuclear power facility.

If you have any questions or require additional information, please contact Mr. Coley Chappell at (802) 451-3374.

Sincerely,

A handwritten signature in black ink, appearing to read "Stan Steel". The signature is fluid and cursive, with the first name "Stan" and last name "Steel" clearly distinguishable.

SS / plc