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December 22, 1999
NRC-99-0116

DOCKET NUMBER
PROPOSED RULE **PR 20**
(64FR35090)

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

- References: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
- 2) Release of Solid Materials at Licensed Facilities: Issues
Paper, Scoping Process for Environmental Issues, and Notice
of Public Meetings (64FR35090), dated June 30, 1999

Subject: Detroit Edison Comments on Issues Paper Regarding
Requirements for Release of Solid Materials at Licensed
Facilities

Detroit Edison, the owner and operator of the Fermi 2 Nuclear Power Plant, submits the following comments on your proposed 10 CFR Part 20 rulemaking for "Release of Solid Materials at Licensed Facilities." These comments are based on a review of the issues paper that was published in the Federal Register, on June 30, 1999, and attendance by a Detroit Edison representative at the public meeting that was conducted in Chicago on December 7 and 8, 1999.

Detroit Edison supports this rulemaking process. As a member of the Nuclear Energy Institute (NEI), we have been working to develop proposals to assure rulemaking that protects the public health and safety, is operationally feasible, and is acceptable to those who are impacted. We have participated in the development of comments by NEI and generally support them as submitted.

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We also wish to add that the industry should be recognized for its current practices, which require the monitoring, using a reasonable degree of sensitivity, of all materials being considered for release, and the requirement that any material released show no detectable contamination. This methodology has long served to allow the release of uncontaminated materials while protecting public health and safety. We thus add our comment that the outcome of this rulemaking process should recognize and build upon the existing methodology, avoiding unduly restrictive new requirements for release of material. The outcome should result in a practical process that all licensees can use and the public can understand.

Should you have any questions or require additional information, please contact me at (734) 586-4258.

Sincerely,



N. K. Peterson
Director – Nuclear Licensing

cc: A. J. Kugler
A. Vogel
NRC Resident Office
Regional Administrator, Region III
Document Control Desk
L. Hendricks [NEI]