

# **Decommissioning Issues**

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# Decommissioning Rulemaking

- ! Scope?
  - ! Focused - emergency planning, insurance, etc.
  - ! Integrated - comprehensive treatment of 10CFR50
  
- ! Industry View
  - ! Integrated rulemaking preferable, if timely
  - ! Stand-alone decommissioning regulations

# Other Potential Discussion Items

- ! Residual contamination vs. Low level waste
- ! Use of decontaminated structures as foundation fill (i.e. rubblelization)
- ! Retention of Part 50 license vs. Conversion to Part 72
- ! Piecemeal release of property

# Spent Fuel Pool Risk Study

- ! NRC's probabilistic analysis is sound
  - " Confirms very low risk associated with decommissioning
  - " Achieves Commission intent to develop a technical basis to risk-inform decommissioning
  
- ! Policy challenge remains - translating risk insights into regulation
  - " Fresh, objective, innovative thinking is needed
  - " Rulemaking staff should assume the lead