

# Can We Risk-Inform Decommissioning?

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# SFP Technical Study

Goal:

Understand risk of SFPs sufficient to risk-inform decommissioning regulations

Status:

Extremely conservative scenarios are compounded to derive a worst case estimate

# Worst Case Scenario Examples

- Seismic probabilities
- “Smart” pool failure
- Ruthenium release
- Cask drop pool failures

# Regulatory Anomaly

Worst case estimate meets all safety goal and quantitative health objectives

Yet -

Staff insists regulation is necessary because “a criterion of sufficient cooling to preclude a fire cannot be satisfied on a generic basis”

# Recommendations

- Complete study on a best estimate basis
- Peer review the study
- Provide Commission guidance on criteria for making risk-informed regulatory decisions
- Trial application to a “simple” regulation  
- e.g. Maintenance Rule