

MEMORANDUM TO: Chairman Meserve
Commissioner Dicus
Commissioner Diaz
Commissioner McGaffigan
Commissioner Merrifield

August 4, 2000

FROM: William D. Travers */RA/*
Executive Director for Operations

SUBJECT: COMPLETION OF THE STANDARD REVIEW PLAN
FOR DECOMMISSIONING

In Staff Requirements Memorandum (SRM) on SECY-98-051, "Guidance in Support of Final Rule on Radiological Criteria for License Termination," dated July 8, 1998 (Attachment 1), the Commission directed the staff to develop a Standard Review Plan (SRP) for evaluating information to support the decommissioning of nuclear facilities. In developing the SRP, the Commission directed the staff to: 1) Ensure that the SRP did not undermine the risk-informed, iterative approach in NUREG-1549, "Decision Methods for Dose Assessment to Comply with Radiological Criteria for License Termination;" 2) Maintain a dialogue with the public throughout the development of the SRP; 3) Include guidance on complying with the as low as is reasonably achievable (ALARA) provisions in 10 CFR Part 20, Subpart E, and on the format and content of information submitted to the NRC to support license termination; 4) Test the SRP on a complex site; 5) Evaluate and review the conservatism in the DandD Screen code; 6) Use a probabilistic approach to calculate the total effective dose equivalent to the average member of the critical group; and, 7) Provide the Commission with a timeline for developing the SRP. Attachment 2 provides an overview of the staff's efforts to address the Commission's directions in the SRM on SECY-98-051.

The timeline was provided to the Commission on September 29, 1998, and indicated that the staff planned to complete and publish the SRP by the end of July 2000. The staff has completed development of the SRP and all of the objectives discussed in the SRM have been met. The staff will commence using the SRP to review decommissioning plans (DPs), license termination plans, and other information submitted by licensees in early September 2000. The staff also intends to provide the SRP to interested individuals for use in developing information to support the decommissioning of licensed nuclear facilities at that time.

The goal of the SRP is to allow NRC staff to evaluate information submitted by licensees, in a timely, efficient, and consistent manner, to determine if the decommissioning can be conducted, such that the public health and safety are protected and the facility can be released in accordance with NRC's requirements. The SRP describes the risk-informed, iterative approach developed by the staff, and provides guidance on the information that should be included in a DP, including evaluation and acceptance criteria for reviewing the information, and suggestions on the format and content of the information. The staff provided a detailed briefing on the approach used to develop the SRP, and the manner in which the staff addressed

the Commission's directions in the SRM on SECY-98-051, to the Commission staff on June 20, 2000.

The SRP implements strategies to achieve the four performance goals of the Agency's Strategic Plan. For the performance goal of maintaining safety, the SRP provides guidance to both the staff and licensees on using a risk-informed and flexible approach to implement the License Termination Rule (LTR) to improve the focus on safety. For the goal of increasing public confidence, our SRP preparation process relied on extensive and early involvement by a wide range of stakeholders to obtain their input regarding decommissioning issues and what guidance would be useful. Workshops and posting draft SRP chapters on a Web site were used to enhance involvement and improve stakeholder understanding of the LTR and decommissioning process. In addition, the approach embodied in the SRP should enhance the public's understanding of the NRC's and licensee's process for developing, reviewing, and approving DPs.

The SRP also contributes to the performance goal of making NRC activities more effective, efficient, and realistic. By consolidating guidance in the SRP and using the risk-informed and flexible approach that incorporates early licensee interactions, higher-quality DPs should be developed that will require fewer requests for additional information. This approach should also contribute to achieving the goal of reducing unnecessary regulatory burden. Consolidated guidance with instructions on how to apply the SRP using a risk-informed approach also improves our regulatory framework and clarifies our decommissioning process for licensees. This should simplify and focus the licensees' preparations of submittals. Furthermore, early interactions with licensees on using the SRP for their site will help identify opportunities to further reduce unnecessary regulatory burden.

In summary, the staff has completed the actions required in the SRM on SECY-98-051 and will commence using the SRP in early September 2000. Public access to the completed SRP will also be provided at that time.

Attachments:

1. SRM-SECY-98-051
2. Overview of Staff's Efforts to
Address Commission Direction
in the SRM on SECY-98-051

cc: SECY
OGC
CFO
OCA
OPA
OSP
CIO

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cc: SECY OGC CFO OCA OPA OSP CIO
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