

**From:** George Hubbard *MR*  
**To:** Charles Tinkler<sup>MS</sup>, Daniel Barss, Diane Jackson, G... *MR*  
**Date:** Wednesday, August 09, 2000 11:55 AM *MR*  
**Subject:** Goals for TWG Report

Attached are goals which Tim has developed with regard to our TWG Report. Please review and be familiar with them so we are all on the same wavelength and headed in the same direction with regard to desired outcomes and outputs. Also, I have attached, FYI, an answer to Tim's question as to "what criteria has been used in past EP exemptions."

Let me or Tim know if you have any questions.

George Hubbard  
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**CC:** Gary Holahan, Jared Wermiel, John Hannon, Ralph...

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**DESIRED OUTCOMES:** Maintain Safety at decommissioning reactor sites while reducing unnecessary regulatory burden. Enhance public confidence in the safety of decommissioning sites.

**DESIRED OUTPUTS:** Decommissioning Rule which defines the time at which EP and Indemnity requirements can be relaxed or removed without a significant impact on safety.

Statement of consideration and technical report which are comprehensive and clear such that public confidence is maintained or enhanced.

**SITUATION:** Licensees want to eliminate EP and Indemnity requirements claiming that risk is low enough shortly after shutdown.

We do not have a good measure of the risk at decommissioning sites.

We have no criteria for when formal EP or Indemnity should be required or relaxed.

There is public opposition to relaxation of requirements.

EP has historically been treated differently from other requirements.

## CRITICAL SUCCESS FACTORS

**TECHNICAL INFO:** What is the current level of risk at decommissioning sites?  
 What factors drive the risk?  
 What risk aversion is attributable to EP?  
 What is the value of EP? Indemnity?  
 TH Analyses  
 Seismic Analyses

**STAKEHOLDER BUY-IN:** ACRS, NEI, UCS  
 Address Public Comments  
 ACRS Meetings  
 Public Meetings  
 Communications Plan

**DECISION CRITERIA:** What are the criteria for imposing EP and Indemnity?  
 What criteria have been used in past EP decisions?  
 What is the purpose of EP?

## EP HISTORY

- Humbolt Bay - Shutdown 1976 - Had no EP while operating
- La Crosse - Shutdown 1987 - EP relief given based only on consideration of DBAs - zirconium fires not considered
- Rancho Seco - Shutdown 1989 - EP relief given based only on consideration of DBAs - zirconium fires not considered
- Ft. St. Vrain - Shutdown 1989 - EP relief given based only on consideration of DBAs - zirconium fires not considered

Dick Dudley said that up until this time (~1990) they only considered DBAs and then RES told them that they could have the zirconium fire and it should be considered. Based on this they started looking at zirconium fires. As indicated below, Trojan tried using SFUEL but had problems. After that they started developing the code SHARP which we have found problems with.

- Yankee Rowe - Shutdown 1991 - EP considered zirconium fire to some extent but granted EP relief based on fact that plant had low density racks
- Trojan - Shutdown 1992 - Considered zirconium fire - tried to use SFUEL to prove 565 °C criteria met but had problems - EP relief was granted based on SFP fragility analysis
- SONGS 1 - Shutdown 1992 - operational - Full EP maintained due to SONGS 2&3 remaining
- Haddam Neck - Shutdown 1996 - EP relief granted based on meeting 565 °C criteria
- Maine Yankee - Shutdown 1996 - EP relief granted based on meeting 10 hour criteria
- Millstone 1 - Shutdown 1995 - operational - Full EP maintained due to Millstone 2&3 remaining
- Zion 1&2 - Shutdown 1996/7 - EP relief granted based on meeting 565 °C criteria
- Big Rock Point - Shutdown 1997 - EP relief granted based on meeting 10 hour criteria