

From: George Hubbard, *NRC*
To: Brian Sheron
Date: 11/27/00 7:31AM
Subject: Decommissioning Risk Study

FYI

DSSA received suggested revisions to the version of the risk study which was given to the EDO on November 9, 2000. These suggested revisions were received the morning of November 21, 2000 and DSSA worked with IOLB personnel and made changes to the study based on their input. IOLB concurred in the report after reviewing the changes made in the report on November 22, 2000. The report was taken to the EDO's Office about 4 PM on November 22.

The cover memo was revised:

To acknowledge that risk was only one consideration in the issue of decommissioning rulemaking.

To clarify that while the February study had indicated that a SFP fire was not possible after 5 years, the current study was unable to establish a generic decay heat level (and therefore decay time) beyond which a SFP fire would not occur.

To clearly state that the staff would have to reevaluate previous NRC positions in regulatory guidance as well as exemptions granted in the areas of insurance and EP at decommissioning sites and safeguards at both operating reactors and decommissioning sites.

To state the risk insights in the report regarding EP did not consider the potential for successful radiological sabotage and used offsite evacuation and protective action assumptions that have not been coordinated with or accepted by FEMA.

To acknowledge that in the area of security the study provided new technical and operational insights which develop potential vulnerabilities not previously considered at decommissioning and operating reactor sites and ISFSIs.

The body of the report was revised, as needed, to be consistent with the information in the cover letter.

However, the bottom line conclusions of the study remain. Namely that the staff was unable, on a generic basis, to establish a time after which a zirconium fire could not occur and relaxations in EP have little impact on risk at decommissioning reactor sites.

**George Hubbard
2870**

CC: Cynthia Carpenter, Daniel Barss, David Diec, Diane Jackson, Gary Holahan, Glenn Tracy, Kathy Gibson, Robert Palla, Robert Skelton(...)

B/BS