



**Risk Informing
Decommissioning Policy**

Commission Meeting

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Clear Coherent Decommissioning Policy is Needed

- Stakeholders: Public, states, industry
- Implications:
 - Past actions: costly requirements for operating plants abandoned
 - Decommissioning funding estimates do not include staffing for costly operating plant requirements



Risk Study

- Is incomplete
- Overstates risk
- Piecemeal
- Unreviewed

Study is dominated by large, low probability seismic events

- Use of these events as sole basis for regulatory action is precedent setting
- Opportunities to identify and apply practical risk insights are missed because large seismic events lead to bounding consequences with no opportunity for mitigation

Recommendations

- Complete analyses to arrive at best estimate
- Conduct formal, independent peer review
- Provide staff with policy guidance on treatment of large, low probability seismic events

