

**From:** Timothy Collins / *NRN*  
**To:** gth George Hubbard, NRC  
**Date:** Tue, Aug 8, 2000 3:53 PM  
**Subject:** Success Path

Here it is

4246

**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?