

Glenn Kelly - your paragraph

**From:** Glenn Kelly, *NRA*  
**To:** George Hubbard  
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**Subject:** your paragraph

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Concern was raised about whether it was or was not possible for errors of omission or commission to occur, which would lead to a zirconium fire at a decommissioning site. In particular, certain actual operator errors at nuclear power plants and other facilities were mentioned.

The staff's risk assessment did not assume that the probability of operator errors leading to uncover of the spent fuel was zero. The staff did estimate the conditional probability of operator recovery to be very high. The staff worked with an expert panel (Gareth Parry, NRC; Harold Blackman, INEEL; and Dennis Bley, Buttonwood Consulting) to determine what a utility would need to implement for the staff to credit the decommissioning fuel handlers with a very low error rate and/or high recovery rate. From the results of this effort, the staff worked with the nuclear industry and other stakeholders to obtain industry commitments (See Appendix ???) regarding issues of particular importance to allowing for recovery credit. In addition, the staff identified decommissioning assumptions (See Sections 3.3.1, 3.3.6, 4.??????) that need to be implemented to help assure that the most important assumptions in the risk assessment come true at the decommissioning plant. The staff believes that this guidance, if implemented, will justify the assumption of high conditional probabilities of recovery.