

Industry Perspectives on Risk Informing Decommissioning Regulations

presented by:

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Scope (per 12/99 SRM)

- Develop an integrated, risk informed rulemaking addressing EP, FP, Security, Backfit and Operator Training (applicability of maintenance rule, fitness for duty, station blackout, fire protection, etc. to D&D plants will benefit from risk insights)



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Defense in Depth Considerations

- Robustness of Pool Structure
- Simplicity of operation
- Slow evolution of all but 2 sequences
- By comparison operating plant address have 100's of sequences for internal events



Perspective Needed for Risk Driven by Rare Seismic Events

- Extremely large seismic events that are background risk factors for operating plants, dominate risk profile for decommissioning plants
- NUREG 1150:
 - avoided including offsite dose consequences from seismic events
 - recommended placing reactor induced accident losses in context of overall losses from the seismic event (report observes nuclear losses likely to be very small)
- Seismic risk can be addressed deterministically:
 - Checklist demonstrates seismic capacity of pool at 2-3 SSE

