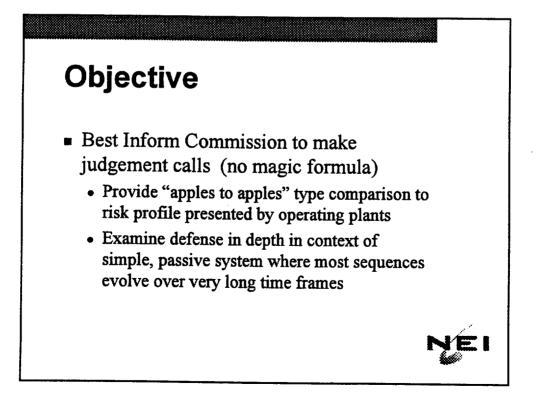


Scope

- Use risk insights to adapt deterministic rules for operating plants to decommissioning plants
- Commission principles on risk informing must be adapted to address
 - Different type of consequences
 - Lower probability
 - Different type of system, e.g., passive, robust, slowly evolving sequences



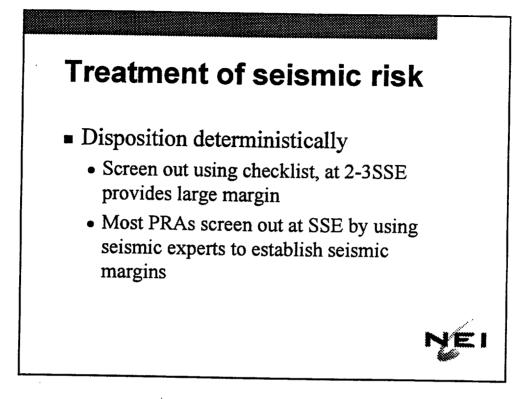
Risk treatment

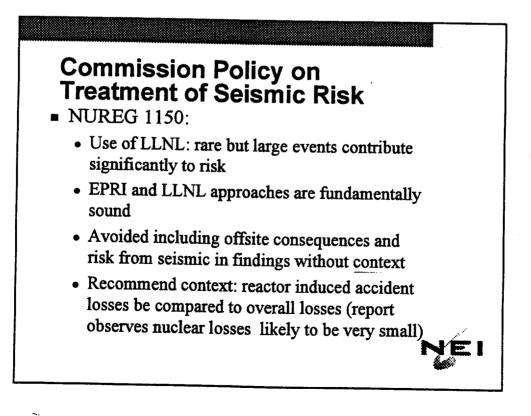
- Best estimates should be used
- Consequences should not be based on phenomena that have not been validated through NRC's severe accident program
- More efforts should be devoted to probability side of risk equation.
- If probability of spent fuel fire is acceptably low there are diminishing returns on efforts to refine consequences

Seismic risk in spent fuel pool risk study

- Huge seismic events that are background risk factors for operating plants, dominate risk profile for decommissioning plants
- Seismic risk should be treated in the same manner for decommissioning plants as for operating plants

-7





Defense in Depth Considerations for spent fuel pool

- Draft risk report observes defense in depth provided by:
 - Robustness of Pool Structure
 - Simplicity of operation
 - Slow evolution of all but 2 sequences
- By comparison operating PRA's have 100's of sequences for internal events

Conclusions

- Bounding estimate of seismic risk should not be used to justify retention of operating plant requirements intended for a much broader scope of initiating events
- Overly conservative treatment of seismic risk leads to conclusion that operating plant requirements should be retained

5

