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# **Spent Fuel Pool Accident Risk at Decommissioning Plants**

**David Lochbaum**

**Nuclear Safety Engineer**

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1/19



# Summary

- **Risk stated in report is non-conservative because threat from sabotage was not analyzed.**
- **Risk stated in report is non-conservative because it relies on invalid assumptions.**
- **Report should not be revised. Instead, Part 72 should be applied.**

*What does this mean?  
What are they?*



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# Staff Finding

**“The staff found that the event sequences important to risk at decommissioning plants are limited to large earthquakes and cask drop events.” pg. ix**



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# Staff Not Looking

**✓ The risk analysis in this study did not evaluate the potential consequences of a sabotage event that could directly cause offsite fission product dispersal.” pg. 4-15**

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# Au Contrare

**“This level of security requires a site with a permanently shutdown site to provide security protection at the same level as for an operating reactor site.” pg. 4-14**



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# Au Contraire, cont.

**BUT,**

- ⇒ **OSREs don't test protection of spent fuel pools/casks at operating reactor sites**
  - ⇒ **OSREs and security inspections are not conducted at permanently closed reactors**
- THEREFORE: Spent fuel storage security is already less than operating reactor security.**



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# Au Contrare, cont.

**“There is a firewater hose station in the SFP [spent fuel pool] area.” pg. 3-3**

**What are the chances of a single person, insider or uninvited guest, dropping one end of that hose into the water and siphoning the SFP water out?**

*Did we cover? yes  
with alams, walkdowns  
etc we don't consider Slide 7  
this to be a problem regardless of  
whether it is intentional or not.*



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# No Need?



**“The staff report released today concludes that there is no immediate safety concern at decommissioned sites and thus no need for immediate regulatory action.”**





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# Need!

**“[T]he nuclear industry, through NEI, made important commitments, which are reflected in the staff’s updated risk assessment.” pg. 3-5**

**“Without this credit, the risk is estimated to be more than an order of magnitude higher.” pg 3-11**



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# Questions

**Shouldn't the individual licensees, not NEI, make these commitments?**

**Could sincere workers at plant XYZ "undo" one or more of the ten commitments in a future cost-saving effort because they were not aware of NEI's pledge?**



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# Questions

**If plant XYZ fails to meet NEI's commitments, will NRC take enforcement action against the plant or NEI?**

**The NRC's ultimate enforcement action for an operating plant is a shutdown order. What is the ultimate for a decommissioning plant?**



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# Conclusions

- ① **Report demonstrates that spent fuel represents a risk that must be properly managed.**
- ② **Interactions to date suggest that report, if revised, may never apply to *any* plant yet alone every plant.**



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# Recommendations

- ① **Spent fuel pool risk at decommissioning plants should be properly managed under 10 CFR Part 72, not 10 CFR Part 50**
- ② **Safety analyses required by Part 72 must be plant-specific and include security evaluations**