



# Decommissioning What's At Stake?

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C'D BY SECY

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# **Safe, Timely, Efficient Decommissioning Essential for:**

- Public Confidence
- Ratepayer and Shareholder Value



# Safe, Timely, Efficient Decommissioning

- What's Needed?
  - Certified Spent Fuel Casks
  - Efficient License Termination Process
  - Risk Informed Regulations

# Spent Fuel Management

- Historical Perspective
  - NRC rules of engagement
  - Cask certification time line reduced
    - ◆ 3-4 years down to about 20 months
  - Scope of certifications are limited!

# Spent Fuel Management

- Impact of Limited Certification
  - Decommissioning plants can't decommission their pools
  - Operating plants can't unload fuel
  - Band-Aids proposed are:
    - ◆ Impractical
    - ◆ VERY costly, i.e., in excess of \$10 Billion



# Limited Scope of Certification

## ■ Recommendations

- PRA would demonstrate extremely low risk
- PRA results support more timely, realistic Internal Staff Guidance



# Spent Fuel Management

- Inefficient Cask Listing/Amendment Process
  - Rulemaking to list takes too long
  - Amendment by rulemaking is a resource nightmare

# Inefficient Cask Listing/Amendments

## ■ Recommendations

- Cut time to process internally
  - ◆ NRC review indicates several months can be eliminated from schedules
  - ◆ NRC PRs for fabrication at risk, final rule withdraw 30-day fabrication hold

# Inefficient Cask Amendment Process

- Recommendations
  - Include process and criteria for amendments in initial listing rule
  - Smarter Certificates
  - Resolve generic issues!!

# Efficient License Termination

## ■ Recommendations

- Test needed for level of detail supporting LTP
- Dual regulation needs legislative fix
- Industry supports NRC initiative on material release
- Novel issues should go to Commission





# **Risk Informing Decommissioning Regulations**

Mike Meisner, President of  
MYAPC



# Risk Informed Regulations

## ■ Overview

- Commission directed staff to integrate and risk inform certain regulations ✓
- Staff produced good model in short time frame ✓
- Conservatism and worst case estimates skewed risk profile and risk insights

*out of date*  
*July Commission*

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# Risk Informing D&D Regs

## ■ Conservatism Added:

- Human reliability — *Revised in Aug*
- Heavy loads (used upper bound from previous analysis)
- Consistent bias toward upper bound (Diesel pump reliability used .18 vs. .044 ALWR)

*Revised  
under main review  
10/10/10*

# Fuel Uncovery Endpoint

- Not related to public risk
- Postulated runaway oxidation correlates with risk to public
- Realistic heatup and endpoint adds 3 days to recovery time! (8 days Vs. 5)

*Handwritten notes:*  
A...  
4/5/86



# Implications for Operating Plants

- Inconsistent with Commission Policy  
and IPEs

WJX  
1/1/02

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# Recommendations

- Credit industry commitments ✓
- Revise study to:
  - Use best estimates ✓
  - Remove conservatisms ✓
- Truncate sequences beyond 2 days / ✓
- Requantify Model ✓

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use  
this  
model