

From: David Matthews *NLR*
To: Gary Holahan *NLR*
Date: Fri, Feb 26, 1999 4:07 PM
Subject: Re: Milestones re Decomm Rules

Gary,

As usual, you've captured the "essence" of the problem we met on yesterday. I think the approach you've outlined and the two month schedule is reasonable. Scott and I, along with John Z and Stu Richards, will attempt a first cut at an integrated schedule for these rulemaking activities, factoring in your estimate. I will have the staff coordinate with George from here on out and let him get you involved as needed. Thanks for your help yesterday in framing a solution.
David

>>> Gary Holahan 02/26 1:35 PM >>>
Dave,

DSSA does not have the lead for any of the Decommissioning rules. However, we are interested in providing technical support to all of the activities. Since there are several technical areas involved, I have asked George Hubbard to coordinate the technical efforts. I think that we can help in defining credible scenarios, boiloff and heatup analysis, probability and consequence analysis.

The first thing we will try to produce is an understanding of how SFP related risks change with time after shutdown (considering decay heat changes, related changes in time for recovery actions, source term changes, release mechanism changes...). Then we can try to compare SFP risks during operation to SFP risks after shutdown.

With this in hand we can begin to provide a logical (and risk-informed) framework for deciding on how reductions in various programs should be allowed. I do not think that starting with the assumption of complete SFP drainage is the proper approach. I propose that we first determine the risk dominant sequences and where the principal uncertainties are and then establish a conservative "design basis" or defined source term (comparable to TID 14844 for operation) if we need to do that as a simplification or to cover for the unknowns. [ACRS calls this the "rationalist approach" as opposed to the "structuralist approach"...I'll send you a paper if your interested]

I think that we need at least a month (and preferably two) to make good sense out of this complex matter. Please let me know if you think that this can meet your needs...and since the re-org is coming up in March, I think that you and John Z both need to be comfortable with the approach...we can't afford to change direction late in this effort.

Gary

>>> David Matthews 02/26 1:00 PM >>>
Guys,

I don't have a feel for the upcoming deadlines (WITS) dates re decomm rules. We need to get a WITS extension request drafted quickly re the Indemnification and EP rulemakings coincident with our development of a plan of action and Commission paper informing world of our revised approach based on our discussion with Gary, et al., yesterday morning. I will be talking to Mike Tschiltz re our plan to provide an integration of these activities with input from NEI. Who has the lead for these items? David

CC: Brian Richter, Brian Sheron, Bruce Boger, Diane...

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