



REACTOR DECOMMISSIONING PROGRAM STATUS

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PRESENTATION OVERVIEW

- **New management team**
- **Safety and risk issue changes**
- **Recent licensing and rulemaking**
- **Future actions**

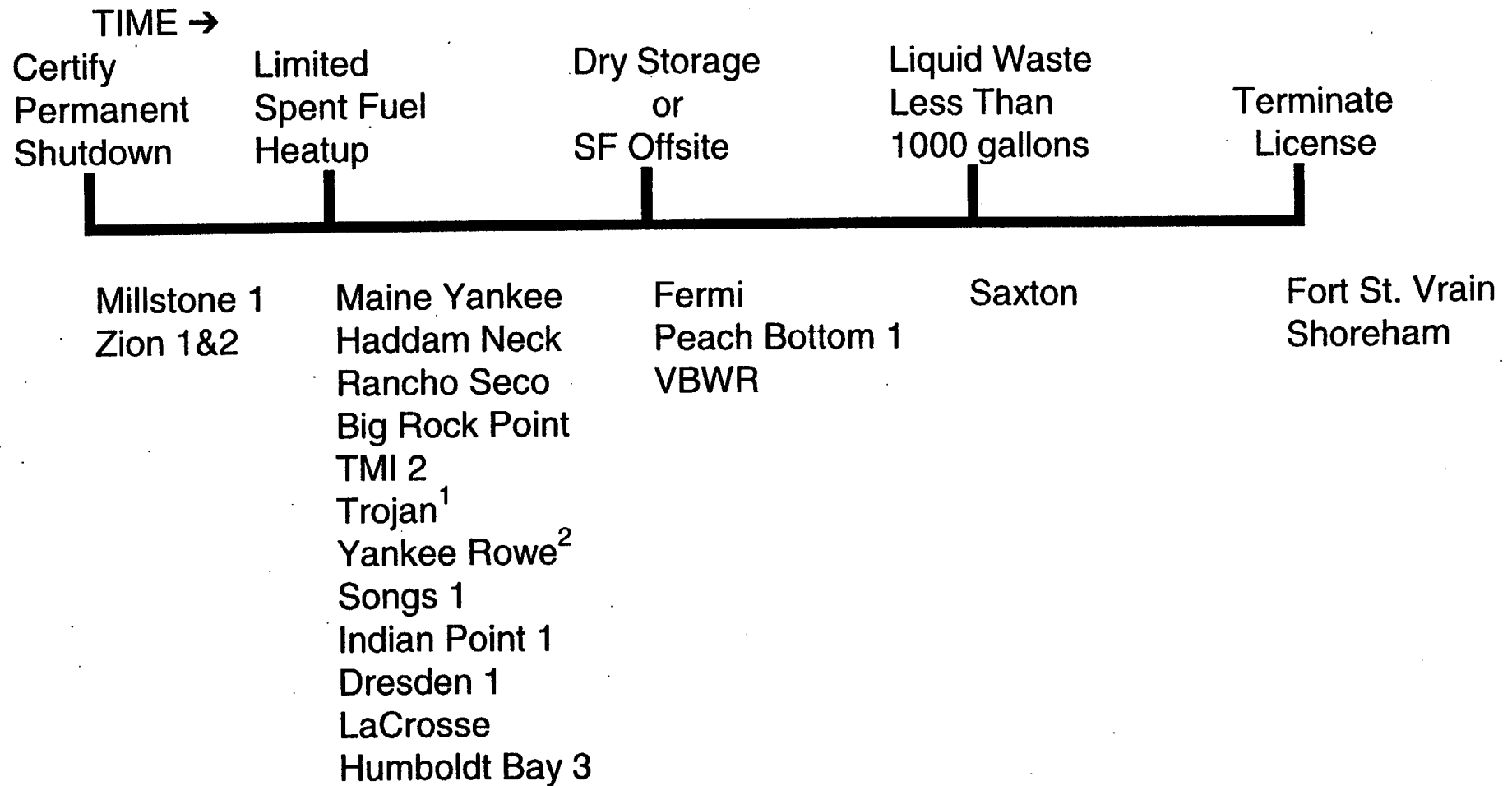
REGULATORY ISSUES FOR DECOMMISSIONING

- **Operation risk reduced**
- **Risk decreases with decay and removal of material**
- **Significant risk reduction when dose consequences within EPA Protective Action Guides (PAG)**

REGULATORY ISSUES FOR DECOMMISSIONING (cont.)

- **Change in operating risk justifies TS changes in**
 - Staffing reductions**
 - Scope of quality assurance**
 - Maintenance programs**
- **Risk associated with fuel storage justifies changes in**
 - Emergency planning**
 - Onsite and offsite insurance**
 - Safeguards**

DOSE CONSEQUENCE REDUCTIONS DURING DECOMMISSIONING



- Notes:
1. Primary dismantled, dry storage & reactor vessel disposal in 2000
 2. Primary dismantled, reactor vessel disposed

“PAST” REGULATORY PRACTICE

- **Basis for approving exemptions has varied for
Emergency preparedness
Safeguards
Insurance**
- **Thus, no identical exemptions**
- **SRM on SECY-93-127, offsite financial protection**
- **SECY-93-127, zircaloy fire “reasonably credible”**
- **Preclusion of zircaloy fire evolved into acceptance
criteria for licensing actions and rulemaking**

CURRENT VIEW

- **Zircaloy fire analyses are complicated and time-consuming**
- **Regulatory predictability questioned**

GOING FORWARD

- **New integrated approach will address concerns**
- **Integrated reevaluation of rulemakings to be initiated**
- **Risk-informed approach considered**
- **Time dependent risk factors considered**
- **NRC Working Group (two months)**
- **Output is plan and schedule**

RULEMAKING STATUS

- **Financial Protection (Insurance)**
- **Emergency Planning**
- **Physical Security/Safeguards**
- **Shift Staffing**
- **Financial Assurance (Site-Specific Cost Estimates)**

OTHER DECOMMISSIONING ISSUES

- **Implementation of the license termination rule**
- **Spent fuel storage and transportation**
- **Low-level waste disposal**
- **Greater-than-Class C waste storage**
- **Free release of contaminated materials**
- **Entombment (time period for completion)**
- **Decommissioning financial assurance**

Summary

- **Valuable insights gained from rulemakings**
- **Reassess issues**
- **Ensure integrated approach**
- **Ensure stakeholder input**
- **Reduce unnecessary regulatory burden**

DISCLAIMER

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