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From: "Paul Blanch" <pdblanch@home.com> *Energy Consultant*
To: "John Zwolinski" <JAZ@nrc.gov> *NRR*
Date: Mon, Nov 1, 1999 1:01 PM
Subject: ACRS and Commission presentations

John:

I will be making a presentation before the ACRS on November 5, 1999 and before the Commission on November 8, 1999. I am enclosing a draft copy of the overheads (Power Point) I plan to use for these presentations.

If you are available I would like to spend a few minutes with you either before or after the ACRS meeting this Friday. The ACRS meeting is from 10:15 to 11:45 AM. I expect to arrive in Rockville about 9 AM on Friday.

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9/1/08

Improving Decommissioning Regulations

Paul M. Blanch

*ACRS Presentation
November 5, 1999*

Proposed Rulemaking

- ◆ **SECY 99-168**
- ◆ **Five year schedule**
- ◆ **Fails to address vital issues**
- ◆ **Part 50 provides no guidance for decommissioning plants**

Significant Issues

- ◆ **Site remediation criteria**
- ◆ **Design basis accidents**
- ◆ **Inconsistent application of Part 50**
- ◆ **No rules for long term storage of HLW (10 CFR 72)**
- ◆ **Plants will store HLW w/o any regulations**
- ◆ **States will dictate requirements**

Inconsistent application of existing regulations

- ◆ **Need to remove uncertainty**
- ◆ **Security, FFD, QA, EP, FP, Codes
& Standards, etc.**

Site remediation criteria

- ◆ EPA vs NRC requirements
- ◆ On site disposal of “clean waste”
- ◆ NRC/EPA need to specify total activity and/or average concentrations.

No rules for long term storage of HLW (10 CFR 72)

- ◆ **General Vs. Site Specific Part 72 license**
- ◆ **Site specific license will add burden, \$\$, and hearings**
- ◆ **Part 50 does not address HLW storage**

Plants will store HLW w/o any regulations

- ◆ **10 CFR 50 does not address HLW storage**
- ◆ **General (Part 72) license intended for operating reactors**
- ◆ **Part 72 is also applicable to wet storage**

Design Bases Accidents

- ◆ **Not based on risk**
- ◆ **Only considers zirc fire**
- ◆ **Fails to consider criticality**
- ◆ **Fails to address other potential accidents**

Recommendations

- ◆ **Proceed with rulemaking on accelerated schedule**
- ◆ **Provide interim guidance (NUREG 6451)**
- ◆ **Apply 10 CFR 72 to decommissioning plants**

Recommendations

- ◆ **Evaluate all potential accidents**
- ◆ **Establish clear site remediation criteria**
- ◆ **Assure consistency and establish predictability**