From: Joseph Staudenmeier
To: George Hubbard, Timothy Collins
Date: Wed, Aug 9, 2000 2:26 PM
Subject: Fwd: Re: RES activity in the decommissioning area

Q/235

From: Carl Feldman
To: Stuart Richards
Date: Wed, Aug 9, 2000 9:44 AM
Subject: Re: RES activity in the decommissioning area

Stu,

I contacted Cheryl Trottier to find out about the second RES effort mentioned (i.e., models and data to analyze entombment and rubbleization decommissioning scenarios). Cheryl said this was an anticipatory effort to provide the NRC staff with dose pathway modeling tools that they could use in determining licensee compliance with our rules (presumably 10 CFR 20. Subpart E on LT dose criteria) if licensees chose to consider entombment or rubblization options for decommissioning. This is a needed effort because present dose modeling code work does not deal with these new options. However, the effort should not impact on the NRR rulemaking because rubblization and entombment concepts should only become of concern at the license termination stage. The use of 50.59, based on the criteria for its use regarding major decommissioning activities, as specified in the 1996 rule, would not be allowed. To take decommissioning actions with these new options activities, the licensee would require an approved license termination plan, etc. Presumably, after the licensee completes the approved LT, the NRC staff would need to validate that the remaining contamination's potential for dosing the public was satisfactory, based on the rule prescribed limiting doses. The described confirmatory process would be the last stage of the NRC's process for them to terminate this license.

While I was writing this e-mail, I received a call from Sud Basu of RES about the first research topic (see e-mail to Basu that I just cc'd you). Based on the information he told me - on the continuation of needed confirmatory experimental research effort to better characterize the oxidation behavior of the cladding (and different effects can occur at different temperatures - such as deformations vs ignition or fire), there is some possibility that the criteria for relief from Price Andersen Indemnity Insurance could change. In particular, a time limit for the spent fuel cooling period believed to be very conservatively chosen, such as the 5 year delay now being considered to use in the proposed amendments, when relief from PA could be granted, may not be limiting - based on fuel cladding integrity information that could be found during completion of the research.

Based on the above consideration, Basu agreed with me that it probably would be better to delay any generic aspects of PA payment relief rule amendments until after the research findings become available. In the meantime, relief could still be provided, but case-specifically. Basu said that if he obtains additional information or insight on the NRR concerns, he will contact me.

>>> Stuart Richards 08/03 10:07 AM >>>

Mel

There are memos at the commission level that discuss funding of RES efforts for FY 2002, that include "Decommissioning Scenarios," "Spent Fuel Pool - Source Term and Cladding Integrity," "Examination of Spent Fuel Pool Accident Risks," and the development of models and data to analyze entombment and rubblization decommissioning scenarios.

Where can I get more detailed information about what these efforts entail, and who is requesting them? Some of these issues will hopefully be put to rest before FY 2002. I'd like to get up to speed on all RES efforts in the decommissioning arena.

Thanks
Stu

CC: Dino Scaletti, Joseph Staudenmeier, Mel Fields, ...