

From: Richard Barrett
To: Hubbard, George
Date: Wed, Aug 9, 2000 1:53 PM
Subject: Re: Goals for TWG Report

George:

I think Tim is headed in the right direction. My main comment is that we need a risk-informed basis for ANY rulemaking on decommissioning pools, not just EP and indemnity. For example, the industry has proposed developing a SFP rule based entirely on the risk study. There would be no other requirements (almost). My proposal for rulemaking has a similar direction.

--Rich

>>> George Hubbard 08/09 11:55 AM >>>

Attached are goals which Tim has developed with regard to our TWG Report. Please review and be familiar with them so we are all on the same wavelength and headed in the same direction with regard to desired outcomes and outputs. Also, I have attached, FYI, an answer to Tim's question as to "what criteria has been used in past EP exemptions."

Let me or Tim know if you have any questions.

George Hubbard
2870

CC: Collins, Timothy

9/236

DESIRED OUTCOMES: Maintain Safety at decommissioning reactor sites while reducing unnecessary regulatory burden. Enhance public confidence in the safety of decommissioning sites.

DESIRED OUTPUTS: Decommissioning Rule which defines the time at which EP and Indemnity requirements can be relaxed or removed without a significant impact on safety.

Statement of consideration and technical report which are comprehensive and clear such that public confidence is maintained or enhanced.

SITUATION: Licensees want to eliminate EP and Indemnity requirements claiming that risk is low enough shortly after shutdown.

We do not have a good measure of the risk at decommissioning sites.

We have no criteria for when formal EP or Indemnity should be required or relaxed. *10 CFR 30.32 (i) (vi) of EPA YAGS Rpt Dan Burss Evans*

There is public opposition to relaxation of requirements.

EP has historically been treated differently from other requirements.

CRITICAL SUCCESS FACTORS

TECHNICAL INFO: What is the current level of risk at decommissioning sites?
What factors drive the risk?
What risk aversion is attributable to EP?
What is the value of EP? Indemnity?
TH Analyses
Seismic Analyses

STAKEHOLDER BUY-IN: ACRS, NEI, UCS
Address Public Comments
ACRS Meetings
Public Meetings
Communications Plan

DECISION CRITERIA: What are the criteria for imposing EP and Indemnity?
What criteria have been used in past EP decisions?
What is the purpose of EP?