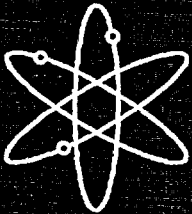


Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities



Supplement 1

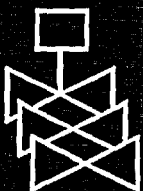


**Regarding the Decommissioning of
Nuclear Power Reactors**



Main Report, Appendices A through M

Final Report



**U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, DC 20555-0001**



COVER-1

UNITED STATES
NUCLEAR REGULATORY COMMISSION
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FINAL

GENERIC ENVIRONMENTAL IMPACT STATEMENT ON DECOMMISSIONING OF
NUCLEAR FACILITIES: REGARDING THE DECOMMISSIONING OF
NUCLEAR POWER REACTORS

NOVEMBER 2002

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COVER-2

Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities

Supplement 1

Regarding the Decommissioning of Nuclear Power Reactors

Main Report, Appendices A through M

Final Report

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Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001



Title

Abstract

This document is a supplement to the U.S. Nuclear Regulatory Commission (NRC) document *Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities* issued in 1988 (NUREG-0586, referred to here as the 1988 Generic Environmental Impact Statement [GEIS]). This Supplement was prepared because of technological advances in decommissioning operations, experience gained by licensees, and changes made to NRC regulations since the 1988 GEIS.

This Supplement updates the information provided in the 1988 GEIS. It is intended to be used to evaluate environmental impacts during the decommissioning of nuclear power reactors as residual radioactivity at the site is reduced to levels that allow for termination of the NRC license. This Supplement addresses only the decommissioning of nuclear power reactors licensed by the NRC. It updates the sections of the 1988 GEIS relating to pressurized water reactors, boiling water reactors, and multiple reactor stations. It goes beyond the 1988 GEIS to explicitly consider high-temperature gas-cooled reactors and fast breeder reactors. This document can be considered a stand-alone document for power reactor facilities such that readers should not need to refer back to the 1988 GEIS. The environmental impacts described in this Supplement supercede those described for power reactor facilities in the 1988 GEIS.

The scope of this Supplement is based on the decommissioning activities performed to remove radioactive materials from structures, systems, and components from the time that the licensee certifies that it has permanently ceased power operations until the license is terminated. The scope of the document was determined through public scoping meetings and meetings with other Federal agencies and the nuclear industry. An evaluation process was then developed to determine environmental impacts from nuclear power reactor facilities that are being decommissioned. The evaluation process involved determining the specific activities that occur during reactor decommissioning and obtaining data from site visits and from licensees at reactor facilities currently being decommissioned. The data obtained from the sites were analyzed and then evaluated against a list of variables that defined the parameters for facilities that are currently operating but which will one day be decommissioned. This evaluation resulted in a range of impacts for each environmental issue that may be used for comparison by licensees that are or will be decommissioning their facilities.

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Executive Summary

This document is a supplement to the U.S. Nuclear Regulatory Commission (NRC) document *Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities*, issued in 1988 (NUREG-0586, referred to hereafter as the 1988 Generic Environmental Impact Statement [GEIS]).^(a) As a supplement, this document considers the technological advances in decommissioning, the experience gained by licensees, and changes made to NRC regulations since the 1988 GEIS. The information from the 1988 GEIS that is still current and applicable to permanently shut down and currently operating commercial nuclear power reactors is included here. This Supplement is intended to be used to evaluate environmental impacts during the decommissioning of nuclear power reactors as residual radioactivity at the site is reduced to levels that allow for termination of the NRC license.

The NRC elected to supplement the GEIS:

- (1) to further the purposes of the National Environmental Policy Act (NEPA)
- (2) to update the information in the GEIS
- (3) to provide additional information to the public on decommissioning activities
- (2) to establish an envelope of environmental impacts that could be associated with decommissioning activities.

Unlike the 1988 GEIS, which took a broad look at decommissioning of a variety of sites and activities, this Supplement addresses only nuclear power reactors licensed by the NRC. It updates the sections of the 1988 GEIS relating to pressurized water reactors, boiling water reactors, and multiple reactor stations. It goes beyond the 1988 GEIS and considers the existing permanently shut down high-temperature gas-cooled reactor and fast breeder reactor. It does not include research and test reactors or the power reactor facilities that have been involved in a significant accident resulting in large-scale contamination of structures, systems, and components (SSCs). It also does not include other types of fuel-cycle facilities, such as fuel-reprocessing plants or small mixed oxide fuel-fabrication plants.

The intent of this Supplement is to consider in a comprehensive manner all aspects related to the radiological decommissioning of nuclear reactor facilities by incorporating updated information, regulations, and analyses. Since the 1988 GEIS was written, the NRC and the industry have gained substantially more nuclear power facility decommissioning experience. Based on the number of reactors shut down and the date that they permanently ceased

(a) The GEIS is considered "generic" in that it evaluates environmental impacts from decommissioning activities common to a number of nuclear power facilities.

Executive Summary

operations, over 200 facility-years' worth of decommissioning experience have accumulated since the NRC published the 1988 GEIS. Currently, there are 19 commercial power reactor facilities in the decommissioning process. This includes nine that permanently ceased operations after the NRC published the 1988 GEIS. Since the 1988 GEIS, there are three facilities that have completed decommissioning and terminated their licenses. There are also new technologies and approaches applicable to decommissioning that the 1988 GEIS does not address. The regulations for decommissioning reactors have also undergone significant changes since the 1988 GEIS.

Scope of the Supplement

The content of this Supplement was initially defined by the scope of the 1988 GEIS and was modified based on current decommissioning regulations, input received during four public scoping meetings, letters and comments received during the scoping period, and meetings between the NRC and the U.S. Environmental Protection Agency (EPA) and the Council on Environmental Quality (CEQ). The public comments received during the scoping process that were considered to be within the scope of the environmental review are provided in Volume 2 Appendix N. The NRC staff published for comment Supplement 1 to the GEIS in October 2001. Public meetings in San Francisco, California, Boston Massachusetts, Chicago, Illinois and Atlanta, Georgia were held in December, 2001 to describe the preliminary results of the NRC environmental review, to answer questions, and to provide members of the public with information to assist them in formatting comments on the draft Supplement. All comments received on the draft Supplement were considered by the staff in developing the final document and are presented in Appendices O and P.

The scope of this Supplement is based on the decommissioning activities performed to remove radioactive materials from SSCs from the time that the licensee certifies that it has permanently ceased power operations until the license is terminated. As a result, the activities performed before permanent cessation of operations (except for decommissioning planning) or impacts that are related to the decision to permanently cease operations (for example, the impact from the loss of generation capacity) are outside the scope of this document.

The Commission defines decommissioning as "to remove a facility or site safely from service and reduce residual radioactivity to a level that permits (1) Release of the property for unrestricted use and termination of the license; or (2) Release of the property under restricted conditions and termination of the license." The staff has included activities that are directly related to the removal of radioactive material from the facility or that must be performed in order to facilitate the removal of contaminated SSCs, as well as the activities and impacts related to the removal of uncontaminated SSCs (such as the intake structure or cooling towers) that were required for the operation of the reactor.

The decommissioning process continues until the licensee requests termination of the license and demonstrates that radioactive material has been removed to the levels that permit

termination of the NRC license. At that point, the NRC no longer has jurisdiction over the site and the owner of the site is no longer subject to NRC regulations. As a result, activities performed after license termination and the resulting impacts are outside the scope of this Supplement. These activities may include any non-NRC required monitoring, site restoration (grading, planting of vegetation, etc.), continued dismantlement (removal of uncontaminated structures or those that have been radiologically decontaminated), or continued use of the site for activities such as power production using natural gas, oil, or coal.

Any potential radiological impacts following license termination that are related to activities performed during the decommissioning period are not considered in this Supplement. Those impacts are covered by the *Generic Environmental Impact Statement in Support of Rulemaking on Radiological Criteria for License Termination of NRC-Licensed Nuclear Facilities* (NUREG-1496). Nonradiological impacts following license termination that are related to activities performed during the decommissioning period are considered in this Supplement.

Levels of Significance and Applicability of Environmental Impacts

This Supplement provides a measure of (a) the significance and severity of potential environmental impacts and (b) the applicability of these impacts to a variety of plants both permanently shut down and operating. The significance of the environmental impacts is described as either SMALL, MODERATE or LARGE. The applicability of these impacts to a variety of plants is categorized as either generic or site-specific.

Levels of Significance: For decommissioning, the staff is using a standard of significance derived from the CEQ terminology for "significantly" (40 CFR 1508.27, which considers "context" and "intensity"). The NRC has defined three significance levels: SMALL, MODERATE, and LARGE.

SMALL - Environmental impacts are not detectable or are so minor that they will neither destabilize nor noticeably alter any important attribute of the resource. For the purposes of assessing radiological impacts in this Supplement, the NRC has concluded that those impacts that do not exceed permissible levels in the Commission's regulations are considered small.

MODERATE - Environmental impacts are sufficient to alter noticeably but not to destabilize important attributes of the resource.

LARGE - Environmental impacts are clearly noticeable and are sufficient to destabilize important attributes of the resource.

The discussion of each environmental issue in this Supplement includes an explanation of how the significance level was determined. In determining the significance level, the NRC staff assumed that ongoing mitigation measures would continue (including those mitigation

Executive Summary

measures implemented during plant construction and/or operation) during decommissioning, as appropriate. Benefits of additional mitigation measures during or after decommissioning are not considered in determining significance levels.

Applicability: In addition to determining the significance of environmental impacts, this Supplement includes a determination of whether the analysis of the environmental issues could be applied to all plants, and whether additional mitigation measures would be warranted. An environmental issue may be assigned to one of two categories:

- **Generic** - For each environmental issue, the analysis reported in this Supplement shows the following:
 - (1) Environmental impacts associated with the issue have been determined to apply either to all plants, or for some issues to plants of a specific size, specific location or having a specific type of cooling system or site characteristics, and
 - (2) A single significance level (i.e., SMALL, MODERATE, or LARGE) has been assigned to the impacts, and
 - (3) Mitigation of adverse impacts associated with the issue has been considered in the analysis, and it has been determined that additional plant-specific mitigation measures are likely not to be sufficiently beneficial to warrant implementation.
- **Site-specific** - For each environmental issue that was determined to be site-specific, the analysis reported in this Supplement has shown that one or more of the generic criteria was not met. Therefore, additional plant-specific review is required. An example of a site-specific issue is threatened and endangered species.

Use and Development of this Supplement

This Supplement can be used by the public to understand the decommissioning process, the activities performed during decommissioning, and the potential environmental impacts resulting from these activities. It identifies activities that can be bounded by a generic evaluation. Licensees can rely on the information in this Supplement as a basis for meeting the requirements in 10 CFR 50.82(a)(6)(ii). This requirement states that the licensee must not perform any decommissioning activity that causes any significant environmental impact not previously reviewed. The NRC staff will also rely on this Supplement as a basis for determining if anticipated decommissioning impacts require an additional review.

The staff first created an initial list of environmental issues and activities that this Supplement should address. The initial list of environmental issues was developed from issues (such as air

quality, aquatic ecology, and radiological impacts) identified in the 1988 GEIS and in the list specified in 10 CFR Part 51, Subpart A, Appendix B, for license renewal. This list was used because it represents the potential impacts associated with nuclear power facilities. The initial list of decommissioning activities was modified based on experience, public participation in the scoping process, site visits to six facilities currently being decommissioned, and meetings with EPA and CEQ. After compiling the issue and activity lists, the staff assessed which activities might have environmental impacts for each of the issues. The next step was to identify the variables that might affect the decommissioning impact for a specific issue and activity. For example, the proximity of the plant to a barge slip or railroad might affect the licensee's decision to remove the steam generator or other large components intact and ship them to a waste site. If the barge slip needs additional dredging, or an additional railroad line needs to be installed, then the environmental impacts may change.

The analyses in this Supplement include data from both operating and decommissioning facilities in order to appropriately span the range of impacts that could be expected. Data from decommissioning facilities was used to determine whether the potential impacts from decommissioning activities for the various issues are generic or site-specific. Data from operating facilities were used to ensure that this Supplement will be valid for all commercial nuclear power reactors.

Alternatives

The alternative to the action of decommissioning is not to decommission the facility. The option to restart the reactor is not considered to be an alternative to decommissioning because the decision to permanently cease operation prevents the licensee from operating the reactor without a significant safety and environmental review by the NRC staff.

The alternative to decommissioning at the end of the licensing period is a "no action" alternative, implying that a licensee would simply abandon or leave a facility after ceasing operations. NRC regulations do not allow the option of not decommissioning. Once the facility permanently ceases operation, if the licensee does not conduct decommissioning activities to an extent that meets the license termination criteria in 10 CFR Part 20, Subpart E, then the license will not be terminated (although the licensee will not be authorized to operate the reactor). The licensee will be required to comply with the necessary requirements for the operating license. As a result, the environmental impacts for maintaining the nuclear reactor facility will be considered to be in the bounds of the appropriate, previously issued Environmental Impact Statements. Under NRC regulations, the original operating license for a nuclear power plant is issued for up to 40 years. The license may be renewed for periods of up to 20 years if NRC requirements are met. However, at the end of the licensing period (whether it has been extended or not), the regulations require that the facility be decommissioned.

Executive Summary

Conclusions

Table ES-1 presents each evaluated environmental issue and identifies whether the issue is considered generic or site-specific. If the issue is considered generic, then it is assigned a significance level of either SMALL, MODERATE or LARGE. Of the environmental issues assessed, most of the impacts are generic and SMALL for all plants regardless of the activities and identified variables (see Appendix E for a list of the variables). The two issues determined to be site-specific are threatened and endangered species and environmental justice. Four issues are considered to be conditionally site-specific.

- land use involving offsite areas to support decommissioning activities
- aquatic ecology for activities beyond the operational area
- terrestrial ecology for activities beyond the operational area
- cultural and historic resources for activities beyond the operational area with no current cultural and historic resource survey.

The operational area is defined as the portion of the plant site where most or all of the site activities occur, such as reactor operation, materials and equipment storage, parking, substation operation, facility service, and maintenance. This includes areas within the protected area fences, the intake, discharge, cooling, and associated structures as well as surrounding paved, graveled, maintained landscape, or other maintained areas.

Licensees undergoing or planning decommissioning of a commercial nuclear power reactor can use this Supplement in support of their evaluation of the environmental consequences from decommissioning. The impacts identified in this Supplement are designed to span the range of impacts from all plants that are currently permanently shut down as well as the plants that are currently operating, including the plants that have or may renew their licenses beyond the original 40-year license; a renewed license can be issued for a period not to exceed 20 years beyond the expiration of the operating license. When planning a specific decommissioning activity, licensees that fall within the bounds of the impacts, as described in Chapter 4, may proceed with the activity with no further analysis. However, if the planned activity could result in environmental impacts greater than those predicted by this supplement, then the activity cannot be performed until the licensee performs a site-specific analysis of the activity. Depending on the results of the site-specific evaluation, the staff may determine that it is appropriate to consult with another agency (such as the U.S. Fish and Wildlife Service or a State Historic Preservation Office). If the activity would result in an impact that is outside the bounds of the GEIS or other environmental assessments, the licensee would be required to submit a license-amendment request.

Table ES-1. Summary of the Environmental Impacts from Decommissioning Nuclear Power Facilities

| Issue | Generic | Impact |
|--|-------------------|---------------|
| Onsite/Offsite Land Use | | |
| - Onsite land use activities | Yes | SMALL |
| - Offsite land use activities | No | Site-specific |
| Water Use | Yes | SMALL |
| Water Quality | | |
| - Surface water | Yes | SMALL |
| - Groundwater | Yes | SMALL |
| Air Quality | Yes | SMALL |
| Aquatic Ecology | | |
| - Activities within the operational area | Yes | SMALL |
| - Activities beyond the operational area | No | Site-specific |
| Terrestrial Ecology | | |
| - Activities within the operational area | Yes | SMALL |
| - Activities beyond the operational area | No | Site-specific |
| Threatened and Endangered Species | No | Site-specific |
| Radiological | | |
| - Activities resulting in occupational dose to workers | Yes | SMALL |
| - Activities resulting in dose to the public | Yes | SMALL |
| Radiological Accidents | Yes | SMALL |
| Occupational Issues | Yes | SMALL |
| Cost | NA ^(a) | NA |
| Socioeconomic | Yes | SMALL |
| Environmental Justice | No | Site-specific |
| Cultural and Historic Resource Impacts | | |
| - Activities within the operational areas | Yes | SMALL |
| - Activities beyond the operational areas | No | Site-specific |
| Aesthetics | Yes | SMALL |
| Noise | Yes | SMALL |
| Transportation | Yes | SMALL |
| Irretrievable Resources | Yes | SMALL |

(a) A decommissioning cost assessment is not a specific National Environmental Policy Act (NEPA) requirement. However, an accurate decommissioning cost estimate is necessary for a safe and timely plant decommissioning. Therefore, this Supplement includes a decommissioning cost evaluation, but the cost is not evaluated using the environmental significance levels nor identified as a generic or site-specific issue.

Abbreviations/Acronyms

| | |
|--------|---|
| μGy | microGray(s) |
| μSv | microSieverts |
| ac | acre(s) |
| AEA | Atomic Energy Act of 1954 |
| AEC | U.S. Atomic Energy Commission |
| ALI | annual limits on intake |
| ALARA | as low as reasonably achievable |
| ANPR | advance notice of proposed rulemaking |
| BLM | Bureau of Land Management |
| BMP | best management practice |
| Bq | Bequerel(s) |
| BWR | boiling water reactor |
| C | Celsius |
| CAA | Clean Air Act |
| CDE | committed dose equivalent |
| CEDE | committed effective dose equivalent |
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act |
| CEQ | Council on Environmental Quality |
| CFR | Code of Federal Regulations |
| Ci | Curie |
| CWA | Clean Water Act |
| DAC | derived air concentration |
| dB | decibel |
| dBA | A-weighted sound levels |
| dB(C) | C-weighted sound levels |
| DBA | design basis accident |
| DDREF | dose or dose rate effectiveness factor |
| DE | dose equivalent |
| DNL | day-night average sound level |
| DOD | U.S. Department of Defense |
| DOE | U.S. Department of Energy |
| DOT | U.S. Department of Transportation |

Abbreviations/Acronyms

| | |
|-------|---|
| EA | environmental assessment |
| EDE | effective dose equivalent |
| EIS | environmental impact statement |
| EJ | environmental justice |
| EPA | U.S. Environmental Protection Agency |
| ER | environmental report |
| ESA | Endangered Species Act of 1973 |
| ES&H | environment, safety and health |
| | |
| F | Fahrenheit |
| FAA | Federal Aviation Administration |
| FBR | fast breeder reactor |
| FES | final environmental statement |
| FHA | Federal Housing Administration |
| FR | Federal Register |
| FSAR | Final Safety Analysis Report |
| ft | foot/feet |
| FWPCA | Federal Water Pollution Control Act (also known as the Clean Water Act of 1977) |
| FWS | U.S. Fish and Wildlife Service |
| | |
| gal. | gallon(s) |
| GEIS | Generic Environmental Impact Statement |
| gpd | gallons per day |
| gpm | gallons per minute |
| GTCC | Greater-than-Class-C (waste) |
| Gy | gray(s) |
| | |
| ha | hectare(s) |
| HDA | high decommissioning activity |
| HEPA | high-efficiency particulate air (filter) |
| HLW | high-level waste |
| h | hour |
| HTGR | high-temperature gas-cooled reactor |
| HUD | U.S. Department of Housing and Urban Development |
| HVAC | heating, ventilation, and air conditioning |
| | |
| IAEA | International Atomic Energy Agency |
| in. | inch(es) |
| I&C | instrumentation and control |

Abbreviations/Acronyms

| | |
|-------------------|---|
| ICRP | International Commission on Radiological Protection |
| ISFSI | independent spent fuel storage installation |
| kg | kilogram(s) |
| km | kilometer(s) |
| kV | kilovolt(s) |
| kWh | kilowatt hour(s) |
| L | liter(s) |
| LDA | low-decommissioning activity |
| LER | licensee event report |
| LET | linear energy transfer |
| LLW | low-level waste |
| LOS | level of service |
| LRA | license renewal application |
| LTP | license termination plan |
| LWR | light water reactor |
| m | meter(s) |
| m ³ /d | cubic meters per day |
| m ³ /s | cubic meters per second |
| MARSSIM | Multi-agency Radiation Survey and Site Investigation Manual, NUREG-1575 |
| MBTA | Migratory Bird Treaty Act of 1918 |
| mi | mile(s) |
| mGy | milliGray(s) |
| MPC | maximum permissible concentrations |
| mrad | millirad(s) |
| mrem | millirem(s) |
| MRS | monitored retrievable storage |
| mSv | milliSievert(s) |
| MTHM | metric tonnes of heavy metal |
| MT | metric ton(s) (or tonne[s]) |
| MTU | metric ton(s)-uranium |
| MW | megawatt(s) |
| MWd/MTU | megawatt-days per metric ton of uranium |
| MW(e) | megawatt(s) electric |
| MW(t) | megawatt(s) thermal |
| MWh | megawatt hour(s) |

Abbreviations/Acronyms

| | |
|-----|------------------------------|
| NA | not applicable |
| NAS | National Academy of Sciences |
| NBS | National Bureau of Standards |

Abbreviations/Acronyms

| | |
|-----------------|---|
| NCRP | National Council on Radiation Protection and Measurements |
| NEI | Nuclear Energy Institute |
| NEPA | National Environmental Policy Act of 1969 |
| NHPA | National Historic Preservation Act of 1966 |
| NIST | National Institute of Standards and Technology |
| NMFS | National Marine Fisheries Service |
| NO _x | nitrogen oxide(s) |
| NPDES | National Pollutant Discharge Elimination System |
| NRC | U.S. Nuclear Regulatory Commission |
| NRR | Nuclear Reactor Regulation |
| NWPA | Nuclear Waste Policy Act of 1982 |

| | |
|------|---|
| ODCM | Offsite Dose Calculation Manual |
| OSHA | Occupational Safety and Health Administration |

| | |
|-------|---|
| PAG | protective action guide |
| PCBs | polychlorobiphenyls |
| PEL | permissible exposure limit |
| POL | possession-only license |
| PPE | personal protective equipment |
| PSDAR | post-shutdown decommissioning activities report |
| PV | pressure vessel |
| PWR | pressurized water reactor |

| | |
|-------|-----------------------------------|
| QA/QC | quality assurance/quality control |
|-------|-----------------------------------|

| | |
|------|--|
| RCRA | Resource Conservation and Recovery Act of 1976 |
| RCS | reactor coolant system |
| ROW | right-of-way/rights-of-way |
| RPV | reactor pressure vessel |

| | |
|-----------------|--|
| SARA | Superfund Amendments and Reauthorization Act |
| SHPO | State Historic Preservation Officer |
| SI | Système Internationale (international system of units) |
| SO ₂ | sulfur dioxide |
| SO _x | sulfur oxide(s) |
| SSCs | structures, systems, and components |
| Sv | sievert(s) |

Abbreviations/Acronyms

| | |
|-------|--|
| TEDE | total effective dose equivalent |
| THPO | Tribal Historic Preservation Officer |
| UNSC | United Nations Scientific Committee on The Effects of Atomic Radiation |
| USC | United States Code |
| USFWS | U.S. Fish and Wildlife Service |
| VOC | volatile organic compound |
| VRM | Visual Resource Management (system) |
| wk | week(s) |
| YNPS | Yankee Nuclear Power Station |
| yr | year(s) |

1.0 Introduction

1.1 Purpose and Need for This Supplement

This document supplements the *Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities* (NRC 1988), issued in 1988 (NUREG-0586, referred to hereafter as the 1988 GEIS) for power reactor facilities. This Supplement updates information provided in the 1988 GEIS by considering technological advances in decommissioning activities gained since 1988 and changes in U.S. Nuclear Regulatory Commission (NRC) regulations and, where appropriate, other agency regulations. The NRC has adopted the following definition of the purpose and need of this Supplement:

The purpose and need are to provide an analysis of environmental impacts from decommissioning activities that can be treated generically so that decommissioning activities for commercial nuclear power reactors conducted at specific sites will be bounded, to the extent practicable, by this and appropriate previously issued environmental impact statements.

This Supplement is intended to be used to evaluate environmental impacts during the decommissioning of nuclear power facilities as residual radioactivity at the site is reduced to levels that allow for termination of the NRC license. This Supplement can be considered a stand-alone document for power reactor facilities such that readers should not need to refer back to the 1988 GEIS. The environmental impacts described in this Supplement supercede those described in the 1988 GEIS for power reactor facilities.

The NRC elected to supplement the 1988 GEIS:

- (1) to further the purposes of the National Environmental Policy Act (NEPA)
- (2) to update the information in the 1988 GEIS
- (3) to provide additional information to the public on decommissioning activities
- (4) to establish an envelope of environmental impacts associated with decommissioning activities.

Unlike the 1988 GEIS, this Supplement covers only reactor facilities licensed by the NRC for commercial power production. It updates the sections of the 1988 GEIS relating to pressurized water reactors, boiling water reactors, and multiple reactor stations. It goes beyond the 1988 GEIS and considers the permanently shut down high-temperature gas-cooled reactors and fast

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breeder reactors. It does not cover research and test reactors or power reactor facilities that have been involved in a significant accident resulting in large-scale contamination of structures, systems, and components (SSCs). It also does not cover other types of fuel-cycle facilities, such as fuel-reprocessing plants or small mixed oxide fuel-fabrication plants.

This Supplement incorporates updated information, regulations, and analyses. Since the 1988 GEIS was written, the NRC and the industry have gained over 200 facility-years' worth of additional decommissioning experience. Currently, there are 19 nuclear power reactor facilities in the decommissioning process. This includes nine that permanently ceased operations after the NRC published the 1988 GEIS. Since the 1988 GEIS, three facilities have completed decommissioning and terminated their licenses: Pathfinder, Shoreham, and Fort St. Vrain. This Supplement addresses new decommissioning technologies and approaches that the 1988 GEIS did not address. Also, the decommissioning regulations have changed since the 1988 GEIS.

1.2 Process Used to Determine Scope of This Supplement

The content of this Supplement was initially defined by the scope of the 1988 GEIS and was modified based on current decommissioning regulations, inputs from the scoping process and the outcome of meetings between the NRC, the U.S. Environmental Protection Agency (EPA), and the Council on Environmental Quality (CEQ).

Four public scoping meetings were held between April and June 2000 as part of the scoping process. During the meetings, the NRC outlined the GEIS revision process and accepted comments regarding the scope of this Supplement. In addition to comments obtained during the scoping meetings, the NRC received 12 letters from industry groups, other interested organizations, and private citizens. A total of 397 comments were provided during the scoping process. The staff reviewed the comments and categorized them as either relevant to this Supplement or outside of its intended scope. The staff prepared and issued a scoping summary report on April 17, 2001 (NRC 2001), that summarized the comments and NRC responses to the comments. Appendix N is an extraction of comments from the scoping summary report that were considered to be within the scope of the environmental review. The NRC staff published for comment draft Supplement 1 to the GEIS in October 2001. Public meetings in San Francisco, California, Boston, Massachusetts, Chicago, Illinois and Atlanta, Georgia, were held in December 2001, to describe the preliminary results of the NRC environmental review, to answer questions, and to provide members of the public with information to assist them in formatting comments on the draft Supplement. All comments received on the draft Supplement were considered by the staff in developing the final document. Appendix O provides a compilation of comments received on the draft Supplement and staff responses to the comments. Originally, the staff planned to publish the scoping

summary and the response to comments in Appendices A and B of this report. However, due to the length of these two appendices, the staff decided to publish these two appendices and the appendix containing the transcripts and comment letters in a second volume. In addition to the scoping meetings, meetings were held with EPA and CEQ between February and November 2000 to obtain input on the scope of the environmental review.

Site visits were conducted by the NRC staff and its contractor at six nuclear reactor facilities that are in various stages of decommissioning. The site visits were conducted to obtain information and to familiarize the NRC team with the current types of activities conducted and the resulting impacts during decommissioning. In addition to the site visits, the Nuclear Energy Institute arranged access to additional site-specific decommissioning data. In addition to the six sites visited, data was received for three other nuclear power reactor facilities.

Information used in this report was also obtained from docketed material, such as post-shutdown decommissioning activity reports (PSDARs), effluent release reports, license termination plans (LTPs), and decommissioning funding plans.

1.3 Scope of This Supplement

Except for decommissioning planning activities, this Supplement considers only activities that occur following certification that fuel has been removed from the reactor. Figure 1-1 illustrates the decommissioning process. Licensee decommissioning activities are listed in the top part of the timeline. Regulatory activities are summarized by the lower part of the timeline. This section discusses licensee decommissioning activities that are within scope and also explains why some activities and impacts are not in scope for this Supplement. Table 1-1 briefly lists decommissioning activities that are within and outside the scope of this Supplement. Additional discussion of the out-of-scope activities is provided in Appendix D.

Impacts related to the decision to permanently cease operations are outside the scope of this Supplement. This includes impacts that result directly and immediately from the act of permanently ceasing operations, regardless of when or why the decision was made. For example, when a reactor ceases operation, the flow of warmer water into the canal, lake, or river that receives the plant's thermal discharges is stopped, and this may impact the organisms in the vicinity of the thermal outfall. However, this impact is not within the scope of this Supplement because it is essentially a restoration of the existing conditions.

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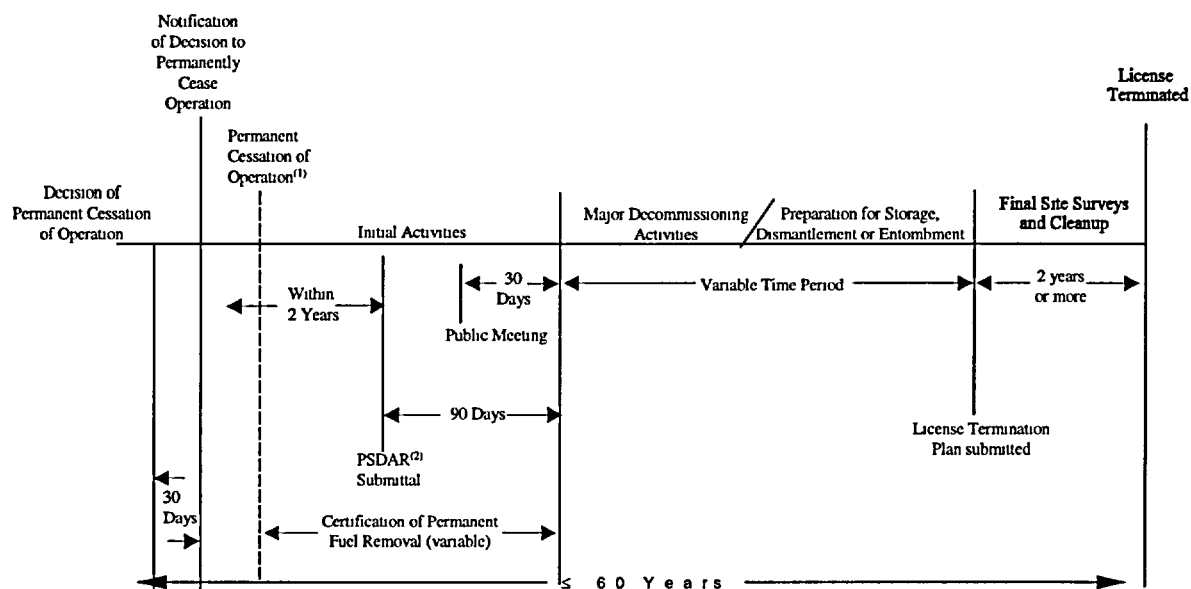


Figure 1-1.
Decommissioning Timeline

- (1) The cessation of operations may occur before, concurrent with, or following the certification to permanently cease operations.
- (2) The PSDAR may be submitted before permanent cessation of operations.

The licensee may declare or certify the date for permanent cessation of operations prior to the end of the license term and while still operating. In such cases, the decommissioning planning activities prior to shutdown and activities and impacts that occur following the actual shutdown of the facility are within the scope of this Supplement. In some circumstances, the licensee may not operate the facility for a period of many years without certifying that they have permanently ceased power operations. In these cases, the activities occurring before the certification is completed would be considered part of the operational phase of the facility and would be within the scope of the site-specific environmental impact statement (EIS) that covers reactor operations but are outside the scope of this Supplement.

The NRC definition for *decommission* in 10 CFR 50.2 is "to remove a facility or site safely from service and reduce residual radioactivity to a level that permits (1) Release of the property for unrestricted use and termination of the license; or (2) Release of the property under restricted conditions and termination of the license." This Supplement is not limited only to activities directly related to the removal of radioactive material from facilities or that must be performed to facilitate removal of contaminated SSCs. The staff has included activities and impacts related

to removing uncontaminated SSCs that were required for reactor operation, such as the intake structure or cooling towers. Including uncontaminated SSCs in this Supplement is consistent with an expectation under NEPA that all impacts associated with an activity and that public concerns about the scope of the review be considered.

Various activities that are performed in conjunction with decommissioning are not considered within the scope of this Supplement, but are reviewed and regulated by the NRC under other licenses. These activities include

- independent spent fuel storage installation (ISFSI) construction, maintenance, and decommissioning – An ISFSI can be operated and decommissioned either under the same license that is used for the operating or decommissioning facility called a general license under 10 CFR Part 50, or under a specific license under 10 CFR Part 72. If a licensee chose to operate the ISFSI under a Part 50 license, it could choose to continue to maintain their Part 50 license, or seek a site -specific 10 CFR Part 72 license for the ISFSI, thus allowing termination of the Part 50 license and the end of the reactor decommissioning process. The NRC staff would also be required to conduct an environmental assessment of the licensee's request for a site-specific 10 CFR Part 72 license.
- spent fuel storage and maintenance – The Commission has independently, in a separate proceeding (the Waste Confidence Proceeding), made a finding that there is

reasonable assurance that, if necessary, spent fuel generated in any reactor can be stored safely and without significant environmental impacts for at least 30 years beyond the licensed life for operation (which may include the term of a revised license) of that reactor at its spent fuel storage basin, or at either onsite or offsite independent spent fuel storage installations. (54 FR 39767)

The Commission has committed to review this finding at least every 10 years. In its most recent review, the Commission concluded that experience and developments since 1990 were not such that a comprehensive review of the Waste Confidence Decision was necessary at that time (64 FR 68005). Accordingly, the Commission reaffirmed its findings of insignificant environmental impacts cited above. This finding is codified in the Commission's regulations at 10 CFR 51.23(a). The staff relies on the Waste Confidence Rule, but has elected to include in this Supplement information related to the storage and maintenance of fuel in a spent fuel pool for completeness.

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Table 1-1. Activities and Impacts Within or Outside the Scope of This Supplement

| In Scope |
|---|
| <ul style="list-style-type: none"> • Activities performed to remove the facility from service from the time that the licensee certifies that the facility has permanently ceased operations • Activities (and the resulting impacts) performed in support of radiological decommissioning, including decontamination and dismantlement of radioactive structures and any activities required to support the decontamination and dismantlement process • Activities performed in support of dismantlement of nonradiological structures, systems, and components (SSCs) required for the operation of the reactor, such as diesel generator buildings and cooling towers • Activities performed up to license termination and their resulting impacts as provided in the definition of decommissioning. Nonradiological impacts occurring after license termination from activities conducted during decommissioning • Activities related to release of the facility • Human health impacts from radiological and nonradiological decommissioning activities • Activities related to preparing the facility for entombment |
| Out of Scope ^(a) |
| <ul style="list-style-type: none"> • Activities and the resulting impacts (other than planning activities) that are performed before permanent cessation of operation is certified • Radiological impacts following license termination • Activities (and the resulting impacts) performed to dismantle structures on the site that are not radiologically contaminated and were not required for operation of the reactor (e.g., training building and administration building) • Activities performed to support installation of alternate energy-generating facilities during or following the decommissioning process • Site restoration activities performed during or after the decommissioning process • Activities (and their impacts) performed after license termination, such as <ul style="list-style-type: none"> - any additional non-NRC required monitoring to evaluate radiological impacts - site restoration - continued use of site for power production or other activities • Activities performed at facilities that are separately licensed or regulated <ul style="list-style-type: none"> - independent spent fuel storage installation (ISFSI) construction, maintenance, or decommissioning - interim storage of Greater-than-Class-C Waste - spent fuel storage,^(b) maintenance, and disposal on or away from a reactor location - low-level waste (LLW) disposal at a licensed LLW site or treatment at compactor facilities • Activities to install engineered barriers and institutional controls for restricted release • Public perceptions and psychological impacts • Activities at facilities that have been permanently shut down by a major accident • Issues related to the ENTOMB option after the facility begins the entombment period |
| <p>(a) A detailed discussion of the reasons for determining that activities are out of scope can be found in Appendix D.</p> <p>(b) As discussed in the text, the staff relies on the Waste Confidence Decision Review (54 FR 39767 and 64 FR 68005) but has chosen to include information related to the storage and maintenance of fuel in a spent fuel pool for completeness in this Supplement.</p> |

- spent fuel transport and disposal away from the reactor location – Transportation of spent fuel and other high-level nuclear wastes is governed by regulations in 10 CFR Part 71, "Packaging and Transportation of Radioactive Material." Disposal of spent fuel and high-level wastes are governed by the Nuclear Waste Policy Act (NWPA) of 1982, as amended, which defined the goals and structure of a program for permanent, deep geologic repositories for the disposal of high-level radioactive waste and nonreprocessed spent fuel. Under this Act, the U.S. Department of Energy (DOE) is responsible for developing permanent disposal capacity for spent fuel and other high-level nuclear wastes. Title 10 CFR Part 60 contains rules governing the licensing to receive and possess source, special nuclear, and by-product material at a geological repository operations area that is sited, constructed, or operated in accordance with the NWPA. However, the Commission issued the final rule to supercede the generic criteria in 10 CFR Part 60 for disposal at a geological repository with specific criteria in 10 CFR Part 63, issued on November 2, 2001 (66 FR 55732).
- LLW disposal at a licensed LLW site or treatment of LLW at compactor facilities – Regulations related to LLW disposal are in 10 CFR Part 61 and 10 CFR Part 20, Subpart K. A final GEIS supporting the regulations in 10 CFR Part 61, "Final Generic Environmental Impact Statement for 10 CFR Part 61" was published as NUREG-0945 (NRC 1982).

A further description of these activities and the basis for not including them in the scope of this supplement is in Appendix D.

The decommissioning process continues until the licensee requests termination of the license and demonstrates that radioactive material has been removed to levels that permit termination of the NRC license. Once the NRC determines that the decommissioning is completed, the license is terminated. At that point, the NRC no longer has regulatory authority over the site, and the owner of the site is no longer subject to NRC regulations. As a result, activities performed after license termination and the resulting impacts are outside the scope of this Supplement. These activities may include any non-NRC required monitoring, site restoration (grading, planting of vegetation, etc.), continued dismantlement or continued use of the site for activities such as power production using natural gas, oil, or coal.

Any potential radiological impacts following license termination that are related to activities performed during decommissioning are not considered in this Supplement. Such impacts are covered by the Generic Environmental Impact Statement in Support of Rulemaking on Radiological Criteria for License Termination of NRC-Licensed Nuclear Facilities, NUREG-1496 (NRC 1997).

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Any potential nonradiological impacts resulting from decommissioning and occurring after termination of the license are considered within the scope of this Supplement. Onsite disposal has been proposed by the industry as a method to dispose of slightly radiologically contaminated building rubble provided that the waste is buried onsite below grade, for example, in existing underground portions of the dismantled plant in such a manner as to meet the site release criteria of 10 CFR Part 20, Subpart E. This concept has been referred to as "Rubblization" (the disposal onsite of slightly contaminated material in a manner to meet the 10 CFR Part 20 release criteria).^(a) On February 14, 2000, the staff informed the Commission of licensee interest in this method and the staff's intent to address Rubblization in this Supplement (NRC 2000). The staff has determined that the long-term radiological aspects of Rubblization, or onsite disposal of slightly contaminated material, would require a site-specific analysis and would be addressed at the time the LTP is submitted. The nonradiological impacts, occurring both during the decommissioning period (e.g., noise, dust, land disturbance), and the long-term impacts occurring after the decommissioning activities are completed (e.g., concrete leaching into the groundwater) can be evaluated generically and are included in the evaluation of each of the applicable environmental issues in Chapter 4 of this document.

Public perceptions and psychological impacts related to the risk of a radiological accident during decommissioning are not addressed in the 1988 GEIS and are not addressed in this Supplement. The U.S. Supreme Court stated in *Metropolitan Edison Co. v. People Against Nuclear Energy*, 460 U.S. 766, at 774-775, that such psychological effects or impacts raised policy questions that fell outside of NEPA. This court case involved an organization of residents living in the area of Three Mile Island, People Against Nuclear Energy (PANE), that claimed the NRC should consider, as part of an EIS, the severe psychological stress caused to its members by the restart of Three Mile Island, Unit 1, after the accident at Three Mile Island, Unit 2. However, in *Metropolitan Edison Co., et al. v. People Against Nuclear Energy* (1983), the Supreme Court read NEPA to require

a reasonably close causal relationship between a change in the physical environment and the effect at issue a risk of an accident is not an effect on the physical environment We believe that the element of risk lengthens the causal chain beyond the reach of NEPA.

(a) The term "rubblization" is frequently used to describe the crushing of structural material (e.g., concrete) to facilitate disposal. The material may be concrete that is uncontaminated or contaminated with radiological material. The staff used the term Rubblization to describe the process of onsite disposal of slightly contaminated material in a manner to meet the site release criteria. For this report, in order to avoid confusion, the staff chose to use the term "demolition" instead of rubblization as the verb to describe the process of crushing structural material to allow for easy burial or disposal.

The decommissioning activities following shutdown of a facility after a major accident resulting in significant contamination of the site are outside the scope of this Supplement. For most types of accidents, decommissioning would be treated on a site-specific basis and, therefore, cannot be considered in a generic sense.

1.4 Categories for Environmental Impacts and Extent of Issues

In the analysis of potential issues in decommissioning activities, two areas in particular were found to benefit from categorization: (a) ranking the significance and severity of potential environmental impacts for proposed decommissioning activities and (b) sorting potential issues as either generic or site-specific.

1.4.1 Levels of Significance of Environmental Impacts

For decommissioning, the staff is using a standard of significance derived from the CEQ terminology for “significantly” (40 CFR 1508.27, which considers “context” and “intensity”). The NRC has defined three significance levels: SMALL, MODERATE, and LARGE.

SMALL – Environmental impacts are not detectable or are so minor that they will neither destabilize nor noticeably alter any important attribute of the resource. For the purposes of assessing radiological impacts in this Supplement, the NRC has concluded that those impacts that do not exceed permissible levels in the Commission’s regulations are considered small.

MODERATE – Environmental impacts are sufficient to alter noticeably, but not to destabilize, important attributes of the resource.

LARGE – Environmental impacts are clearly noticeable and are sufficient to destabilize important attributes of the resource.

The discussion of each environmental issue in this Supplement includes an explanation of how the significance level was determined. In determining the significance level, the NRC staff assumed that ongoing mitigation measures would continue (including those mitigation measures implemented during plant construction and/or operation) during decommissioning, as appropriate. Benefits of additional mitigation measures during or after decommissioning are not considered in determining significance levels.

1.4.2 Regulatory Distinction of Generic and Site-Specific Approaches

In addition to determining the significance of environmental impacts, this Supplement includes a determination of whether the analysis of the environmental issue could be applied to all plants, and whether additional mitigation measures would be warranted. An environmental issue may be assigned to one of two categories (generic or site-specific) described below.

- Generic – For each environmental issue, the analysis reported in this Supplement shows the following:
 - (1) Environmental impacts associated with the issue have been determined to apply either to all plants, or for some issues to plants having a specific size, specific location, or having a specific type of cooling system or other site characteristics, and
 - (2) A single significance level (i.e., SMALL, MODERATE, or LARGE) has been assigned to the impacts, and
 - (3) Mitigation of adverse impacts associated with the issue has been considered in the analysis, and it has been determined that additional plant-specific mitigation measures are not likely to be sufficiently beneficial to warrant implementation.
- Site-specific – For each environmental issue that was determined to be site-specific, the analysis reported in this Supplement has shown that one or more of the generic criteria was not met. Therefore, additional plant-specific review is required.

1.5 Uses of This Supplement

This Supplement can be used by the public to understand the decommissioning process, the activities performed during decommissioning, and the potential environmental impacts resulting from these activities. The Supplement does not (1) establish or revise regulations, (2) impose requirements, (3) provide relief from requirements, or (4) provide guidance on the decommissioning process.

This Supplement identifies activities that can be bounded by a generic evaluation. It also identifies the decommissioning activities and associated environmental issues that will likely require site-specific analysis before performing a decommissioning activity.

Licensees can rely on the information in this Supplement as a basis for meeting the requirements in 10 CFR 50.82(a)(6)(ii). This requirement states that the licensee must not perform any decommissioning activity that causes any significant environmental impact not previously

reviewed. Prior to conducting a decommissioning activity, the licensee must make a determination that the resulting environmental impacts fall within the bounds of this Supplement or of another EIS related to its facility. When finalized, licensees are expected to reflect the environmental impacts described in this Supplement rather than those in the 1988 GEIS. For any decommissioning activity that does not meet these conditions, the regulations prohibit the licensee from undertaking the activity until it performs a site-specific analysis of the activity. Depending on the results of the site-specific evaluation, the staff may determine that it is appropriate to consult with another agency about the potential impacts. Such agencies could include the U.S. Fish and Wildlife Service or a State Historic Preservation Office. If the activity would result in an impact that is outside the bounds of the GEIS or other environmental assessments, the licensee would be required to submit a license-amendment request. The NRC staff periodically inspects the licensee's procedures and documentation to ensure that a proper environmental review is part of the screening criteria used for proposed changes to the facility.

In addition to the NRC staff's review of the licensee's procedures and documentation, there are two points during the decommissioning process when the licensee performs an evaluation of environmental impacts. The first evaluation occurs when the licensee must submit a PSDAR to the NRC (within two years following permanent cessation of operation). The PSDAR must include a discussion that provides the reasons for concluding that the environmental impacts associated with the licensee's planned site-specific decommissioning activities will be bounded by an appropriate previously issued environmental assessments, including this Supplement. If the licensee identifies environmental impacts that are not bounded by a previous NRC environmental assessment, the licensee must address the impacts in a request for a license amendment regarding the activities. The licensee must also submit a supplement to its environmental report (ER) that describes and evaluates the additional impacts. The NRC will review the supplement to the ER in conjunction with its review of the license-amendment request.

The second evaluation is near the end of decommissioning at the time when the licensee submits an application for license termination. In accordance with 10 CFR 50.82(a)(9), a licensee must submit its LTP at least 2 years before the anticipated termination date of the license. The LTP must be a supplement to the Final Safety Analysis Report or its equivalent for the facility and is submitted as a license amendment. The NRC requires an environmental review as part of the review of the license-amendment request. Thus, the LTP must include a supplement to the ER that describes any new information or significant environmental change associated with the licensee's proposed termination activities. The NRC staff will also rely upon this supplement as a basis for determining if anticipated decommissioning impacts require an additional review.

1.6 Development of This Supplement

The requirements in 10 CFR Part 51 were followed for the development of this Supplement.

- I This included conducting scoping meetings and obtaining public comments (see Appendix N). From these meetings and meetings with other appropriate government agencies, the staff defined the scope of this Supplement (see Sections 1.2 and 1.3). During the scoping process, the staff developed an evaluation process for determining the environmental impacts from decommissioning. Section 4.2 provides additional discussion of the process and Appendix E provides a detailed description of the analysis used to identify the environmental impacts from decommissioning. The evaluation process involved determining the specific activities that occur during decommissioning and obtaining data from site visits and from an information request to decommissioning plants that was related to the impact of these activities at currently decommissioning facilities. The data obtained from the decommissioning sites were analyzed and then evaluated against a list of variables that defined the parameters for plants that are currently operating but which will one day be decommissioned. This evaluation resulted in a range of impacts for each environmental issue that may be used for comparison by licensees that are or will be decommissioning their facilities.

1.7 Parts of This Supplement

Chapter 2 provides background, describing the basis for the current regulations and summarizing the regulations. Chapter 3 describes the types of plants covered by this Supplement, which includes permanently shutdown reactor facilities as well as operating facilities that will eventually cease power operations. Chapter 3 also describes the location and types of buildings on the sites, the systems that may still be active after permanent shutdown, and changes in effluents after permanent shutdown. Chapter 4 describes activities conducted during the decommissioning process and impacts that could arise from these activities. The analysis of the impacts is based on variables such as the option of decommissioning, location of plant, type of plant, and timing of the activity. Chapter 5 discusses the "No Action" alternative to decommissioning, which is the abandonment of the facility after the cessation of operations.

- I Chapter 6 contains the summary of findings and conclusions.

1.8 References

10 CFR 20. Code of Federal Regulations, Title 10, *Energy*, Part 20, "Standards for protection against radiation."

10 CFR 50. Code of Federal Regulations, Title 10, *Energy*, Part 50, "Domestic licensing of production and utilization facilities."

10 CFR 51. Code of Federal Regulations, Title 10, *Energy*, Part 51, “Environmental protection regulations for domestic licensing and related regulatory functions.”

10 CFR 60. Code of Federal Regulations, Title 10, *Energy*, Part 60, “Disposal of high-level radioactive wastes in geologic repositories.”

10 CFR 61. Code of Federal Regulations, Title 10, *Energy*, Part 61, “Licensing requirements for land disposal of radioactive waste.

10 CFR 63. Code of Federal Regulations, Title 10, *Energy*, Part 63, “Disposal of high-level radioactive wastes in a geologic repository at Yucca Mountain, Nevada.”

10 CFR 71. Code of Federal Regulations, Title 10, *Energy*, Part 71, “Packaging and transportation of radioactive material.”

10 CFR 72. Code of Federal Regulations, Title 10, *Energy*, Part 72, “Licensing requirements for the independent storage of spent nuclear fuel, high-level radioactive waste, and reactor-related greater-than-Class-C waste.”

40 CFR 1508. Code of Federal Regulations, Title 40, *Protection of the Environment*, Part 1508, “Terminology and Index.”

54 FR 39767. “10 CFR Part 51 Waste Confidence Decision Review.” *Federal Register*. September 28, 1989.

64 FR 68005. “Waste Confidence Decision Review.” *Federal Register*. December 6, 1999.

66 FR 55732. “Disposal of High-Level Radioactive Wastes in a Proposed Geologic Repository at Yucca Mountain, Nevada.” *Federal Register*. November 2, 2001.

Metropolitan Edison Co., et al v. People Against Nuclear Energy, 460 U.S. 766, at 774-775. 1983.

National Environmental Policy Act (NEPA) of 1969, as amended, 42 USC 4321 et seq.

Nuclear Waste Policy Act of 1982, as amended, 42 USC 10.101 et seq.

U.S. Nuclear Regulatory Commission (NRC). 1982. *Final Generic Environmental Impact Statement for 10 CFR Part 61*. NUREG-0945, NRC, Washington, D.C.

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U.S. Nuclear Regulatory Commission (NRC). 1988. *Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities*. NUREG-0586, NRC, Washington, D.C.

U.S. Nuclear Regulatory Commission (NRC). 1997. *Final Generic Environmental Impact Statement in Support of Rulemaking on Radiological Criteria for License Termination of NRC-Licensed Nuclear Facilities*. NUREG-1496, Vol. 1, NRC, Washington, D.C.

U.S. Nuclear Regulatory Commission (NRC). 2000. "SECY-00-0041 Use of Rubblized Concrete Dismantlement to Address 10 CFR Part 20, Subpart E, Radiological Criteria for License Termination." NRC, Washington, D.C.

U.S. Nuclear Regulatory Commission (NRC). 2001. Letter from U.S. NRC to Distribution: "Subject: Issuance of a scoping summary report of comments received related to the intent to develop a Supplement to NUREG-0586." Dated April 17, 2001.

2.0 Background Information Related to Decommissioning Regulations

This section provides background information that will assist the reader in understanding the requirements for decommissioning and license termination. The basis for the current decommissioning regulations and a summary of the current regulations are provided below. This chapter and Chapter 3, "Description of NRC Licensed Reactor Facilities and the Decommissioning Process," will give the reader a basic understanding of the overall reactor decommissioning process and environmental impact assessments used during the process.

2.1 Basis for Current Regulations

In the mid-1990s, the Commission initiated an effort to significantly change the regulations for decommissioning power reactor facilities. The new regulations were intended to make the decommissioning process more current, efficient, and uniform. On July 29, 1996, a final rule revising 10 CFR 50.82, "Decommissioning of Nuclear Power Reactors," was published in the Federal Register (61 FR 39278). This rule redefined the decommissioning process and modified the regulations written in 1988, which had required submittal of a detailed decommissioning plan before the start of decommissioning.

The regulations were revised based on experience gained from reactor decommissionings that had occurred during the 1980s and early 1990s. Review of the activities that occur during decommissioning showed that they are similar to the activities that occur during the construction, operation, maintenance, and refueling outages of a power reactor (e.g., decontamination, steam generator replacement, and pipe removal). However, the magnitude of some activities during decommissioning (e.g., removal of piping) is considerably greater than during operations. Activities associated with the decommissioning of facilities had resulted in impacts consistent with or less than those evaluated in the 1988 *Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities* (GEIS), NUREG-0586 (NRC 1988). Based on the above reasons, the Commission determined that review and approval by the U.S. Nuclear Regulatory Commission (NRC) staff of a detailed decommissioning plan was not necessary.

2.2 Summary of Current Regulations

2.2.1 Regulations for Decommissioning Activities

The current regulations (10 CFR 50.82) specify the regulatory actions that both the NRC and the licensee must take to decommission a nuclear power facility. Once the licensee decides to permanently cease operations, it must submit, within 30 days, a written certification to the NRC.

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The notification must contain the date on which the power-generating operations ceased or will cease. The licensee must permanently remove all fuel from the reactor and submit a written certification to the NRC confirming the completion of fuel removal. Once this certification has been submitted, the licensee is no longer permitted to operate the reactor, or to put fuel back into the reactor vessel. After certification that the fuel is removed, the annual license fee to the NRC is reduced as well as the licensee's obligation to adhere to certain requirements that are needed only during reactor operations.

In addition to the certifications, the licensee must submit a post-shutdown decommissioning activities report (PSDAR) to the NRC and any affected States no later than 2 years after the date of permanent cessation of operations. Section 10 CFR 50.82 requires that the PSDAR include

- a description of the licensee's planned major decommissioning activities
- a schedule for completing these activities
- an estimate of the expected decommissioning costs
- a discussion that provides the reasons for concluding that the environmental impacts associated with site-specific decommissioning activities will be bounded by an appropriate previously issued environmental impact statement (EIS).

After receiving a PSDAR, the NRC publishes a notice of receipt in the Federal Register, makes the PSDAR available for public review and comment, and holds a public meeting in the vicinity of the facility to discuss the licensee's plans. The NRC will examine the PSDAR to determine if the required information is included and will inform the licensee in writing if there are deficiencies that must be addressed before the licensee initiates any major decommissioning activities. The regulations require a 90-day waiting period after submittal of the PSDAR before the licensee may commence major decommissioning activities.

The purpose of the PSDAR is to provide the NRC and the public with a general overview of the licensee's proposed decommissioning activities. The PSDAR serves to inform the NRC staff of the licensee's expected activities and schedule, which facilitates planning for inspections and decisions regarding NRC oversight activities. The PSDAR is also a mechanism for informing the public of the proposed decommissioning activities before those activities are conducted.

Prior to submission of the PSDAR, the licensee can conduct a variety of activities at the site including activities to ensure the safe shutdown of the facility. Systems can be drained, components removed, and certain structures demolished. However, the licensee is prohibited from undertaking any major decommissioning activity as defined in 10 CFR 50.2.

Once the PSDAR has been submitted and the 90-day period has been completed, the licensee may begin major decommissioning activities, which may include the following:

- permanent removal of major radioactive components, such as the reactor vessel, steam generators, or other components that are comparably radioactive
- permanent changes to the containment structure
- dismantling of components containing Greater-than-Class-C (GTCC) Waste.^(a)

In accordance with 10 CFR 50.82(a)(6)(ii), licensees shall not perform any decommissioning activities "that result in significant environmental impacts not previously reviewed." If any decommissioning activity does not meet this requirement, the licensee must submit a license-amendment request before conducting the activity. The licensee also must submit a supplement to its environmental report (ER) that relates to the additional impacts. The NRC will review the ER Supplement, and prepare an environmental assessment (EA) or EIS, and amendment to the license in conjunction with its review.

The licensee can choose (1) to immediately decontaminate and dismantle the facility (DECON), or (2) to place the facility in long-term storage (SAFSTOR) followed by subsequent decontamination and dismantlement, or (3) to perform some incremental decontamination and dismantlement activities before or during the storage period of SAFSTOR. Under the current regulations, unless the licensee receives permission to the contrary, the site must be decommissioned within 60 years. Chapter 3 describes in more detail the decommissioning

(a) The NRC has adopted a waste classification system for low-level radioactive waste based on its potential hazards, and has specified disposal and waste form requirements for each of the general classes of waste: A, B, and C. The classifications are based on the key radionuclides present in the waste and their half-lives. Tables defining these three classes are contained in 10 CFR 61.55. In general, requirements for waste form, stability, and disposal methods become more stringent when going from Class A to Class C. GTCC waste exceeds the concentration limits in 10 CFR 61.55 and is generally unsuitable for near-surface disposal as low-level waste (LLW), even though it is legally defined as LLW. The NRC's regulations in 10 CFR 61.55(a)(2)(iv) require that this type of waste must be disposed of in a geologic repository unless approved for an alternative disposal method on a case-specific basis by the NRC. 10 CFR Part 72 allows for interim storage of GTCC from a commercial power reactor.

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options available to the licensee. In this Supplement, the staff also evaluates another option called ENTOMB, which encases the radioactive contaminants in a structurally long-lived material.

2.2.2 Regulations for License Termination

In order to terminate the license and allow release of the site, the licensee must submit a license termination plan (LTP). In accordance with 10 CFR 50.82(a)(9), an application for license termination must be accompanied or preceded by an LTP, which is subject to NRC review and approval. The licensee must submit the LTP at least 2 years before the date of license termination. The LTP approval process is by license amendment. By regulation, the LTP must include the following:

- a site characterization
- identification of remaining dismantlement activities
- plans for site remediation
- detailed plans for the final survey of residual contamination
- a description of the end-use of the site (if restricted use is proposed)
- an updated site-specific estimate of remaining decommissioning costs
- a supplement to the ER.

The licensee must submit the LTP as a supplement to its Final Safety Analysis Report or as an equivalent document, thus formalizing the steps necessary to revise the document.

After receiving the LTP, the NRC will place a notice of receipt of the plan in the Federal Register and will make the plan available to the public for comment. The NRC will schedule a public meeting near the facility to discuss the plan's contents and the staff's process for reviewing the submittal. The NRC will also offer an opportunity for a public hearing on the license-amendment request associated with the LTP. At this stage, a site-specific EA is required. Depending on the circumstances, the EA evaluation can result in the development of a full EIS. If the LTP demonstrates that the remainder of decommissioning activities will be performed in accordance with NRC regulations, are not detrimental to the health and safety of the public, and will not have a significant adverse effect on the quality of the environment, the

Commission will approve the plan by a license amendment (subject to whatever conditions and limitations the Commission deems appropriate and necessary).

After the approval of the LTP, the NRC will continue its inspection of the site. These inspections will include validation of commitments made in the LTP. Inspections may also include confirmatory surveys to verify that areas of the site have been decontaminated to the limits established in the LTP.

On July 21, 1997, the NRC published (also in the Federal Register) a final rule entitled, "Radiological Criteria for License Termination" (64 FR 39058) prescribing specific radiological criteria for license termination. At the end of the LTP process, if the NRC determines that the remaining dismantlement has been performed in accordance with the approved LTP, and if the final radiation survey and associated documentation demonstrate that the facility and site are suitable for release, then the Commission will terminate the license.

The radiological criteria for license termination are given in 10 CFR Part 20, Subpart E. There are two broad categories of uses for the facility after the license termination: unrestricted use and restricted use.

Unrestricted use means that there are no NRC-imposed restrictions on how the site may be used. State and local jurisdictions may, and have, imposed additional restrictions or requirements on licensees. The licensee is free to continue to dismantle any remaining buildings or structures and to use or sell the land for any type of application. The Commission has established a 0.25 mSv/yr (25 mrem/yr) total effective dose equivalent (TEDE) to an average member of the critical group^(a) as an acceptable criterion for release of any site for unrestricted

(a) The "critical group" is that group of individuals reasonably expected to receive the highest exposure to residual radioactivity within the assumptions of a particular scenario. The average dose to a member of the critical group is represented by the average of the doses for all members of the critical group, which in turn is assumed to represent the most likely exposure situation. For example, when considering whether it is appropriate to "release" a building that has been decontaminated (allow people to work in the building without restrictions), the critical group would be the group of employees that would regularly work in the building. If radiation in the soil is the concern, then the scenario used to represent the maximally exposed individual is that of a resident farmer. The assumptions used for this scenario are prudently conservative and tend to overestimate the potential doses. The added "sensitivity" of certain members of the population, such as pregnant women, infants, children, and any others who may be at higher risk from radiation exposures, are accounted for in the analysis. However, the most sensitive member may not always be the member of the population that receives the highest dose. This is especially true if the most sensitive member (e.g., an infant) does not participate in activities that provide the greatest dose or if they do not eat specific foods that cause the greatest dose.

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use. The licensee will be required to show that the site can meet this criterion before the license will be terminated for unrestricted use. In addition, the licensee will need to show that the amounts of residual radioactivity have been reduced to levels that are as low as reasonably achievable (ALARA).^(a) For sites that have been determined to be acceptable for unrestricted use, there are no requirements for further measurement of radiation levels. It is not expected that these radiation levels would change (other than to be reduced over time through radioactive decay), and there would be no mechanism for further contamination or radiological releases.

Restricted use means that there are restrictions on the facility use after license termination. A site would be considered acceptable for license termination under restricted conditions if the licensee can demonstrate that further reductions in residual radioactivity necessary to meet the requirements for unrestricted use would result in net public or environmental harm, or were not being made because the residual levels were ALARA. In addition, the licensee must have made provisions for legally enforceable institutional controls (e.g., use restrictions placed in the deed for the property) that provide reasonable assurance that the radiological criteria set by the NRC (0.25 mSv/yr [25 mrem/yr] TEDE to an average member of the critical group) will not be exceeded. The licensee must also have provided sufficient financial assurance to an amenable independent third party to assume and carry out responsibilities for any necessary control and maintenance of the site. There are also regulations relating to the documentation of how the advice of individuals and institutions in the community who may be affected by decommissioning has been sought and incorporated in the LTP if the license is to be terminated under restricted conditions.

Residual radioactivity at the site must be reduced so that if the institutional controls were no longer in effect, there would be reasonable assurance that the TEDE from residual radioactivity distinguishable from background to the average member of the critical group would be ALARA and would not exceed either 1 mSv/yr (100 mrem/yr) or 5 mSv/yr (500 mrem/yr). In the latter case, the licensee must (1) demonstrate that further reductions in residual radioactivity necessary to comply with the 1 mSv/yr (100 mrem/yr) value are not technically achievable, would be prohibitively expensive, or would result in net public or environmental harm, (2) make provisions for durable institutional controls, and (3) provide sufficient financial assurance to enable a responsible government entity or independent third party to carry out periodic checks of the facility no less frequently than every 5 years to ensure that the institutional controls remain in place.

(a) The ALARA concept means that all doses are to be reduced below required levels to the lowest reasonably achievable level considering economic and societal factors. Determination of levels that are ALARA must consider any detriments, such as deaths from transportation accidents, that are expected to potentially result from disposal of radioactive waste.

Alternate release criteria may be used in specific cases. The use of alternate criteria to terminate a license requires the approval of the Commission after consideration of the NRC staff's recommendations that address comments provided by the U.S. Environmental Protection Agency and any public comments submitted pursuant to 10 CFR 20.1405. These alternate criteria are expected to be used only in very rare cases.

To date, the three NRC-licensed facilities (Shoreham, Fort St. Vrain, and Pathfinder) that have completed the decommissioning process have had their licenses terminated, allowing unrestricted use of the sites. License termination plans have been submitted for three other facilities. The LTPs describe plans for unrestricted use of the sites following license termination. No nuclear power licensees have indicated that they plan for restricted use of the site after license termination.

A proposed rule was issued on September 4, 2001 (66 FR 46230) for partial site release prior to license termination. Partial site release means release of part of a nuclear power reactor facility or site for unrestricted use prior to NRC approval of the LTP. The NRC proposes to add a new section to 10 CFR Part 50, separate from the existing rules for decommissioning and radiological criteria for license termination, that identifies the requirements and criteria necessary for partial site release. The proposed rule includes associated amendments to 10 CFR Part 2 and 10 CFR Part 20. The purpose of this rulemaking is to ensure that any remaining residual radioactive material from licensed activities on a portion the site released for unrestricted use will meet the radiological criteria for license termination.

Licensees will be required to submit information necessary to demonstrate the following:

- The release of radiologically impacted property complies with the radiological criteria for unrestricted use in 10 CFR 20.1402 (0.25 mSv/yr [25 mrem/yr] to the average member of the critical group and ALARA).
- The licensee will continue to comply with all other applicable regulatory requirements that may be affected by the release of property and changes to the site boundary. This would include, for example, requirements in 10 CFR Parts 20, 50, 72, and 100.
- Records of property-line changes and the radiological conditions of partial site releases are being maintained to ensure that the dose from residual material associated with these releases can be accounted for at the time of any subsequent partial releases and at the time of license termination.

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The proposed rule provides additional flexibility to licensees who are releasing property that has never been radiologically impacted. While an amendment of the Part 50 operating license is required to release radiologically impacted property, the proposed rule offers the opportunity for a letter submittal for partial releases if the licensee can demonstrate that there is no reasonable potential for residual radioactivity from license activities.

2.3 References

10 CFR 2. Code of Federal Regulations, Title 10, *Energy*, Part 2, "Rules of practice for domestic licensing proceedings and issuance of orders."

10 CFR 20. Code of Federal Regulations, Title 10, *Energy*, Part 20, "Standards for protection against radiation."

10 CFR 50. Code of Federal Regulations, Title 10, *Energy*, Part 50, "Domestic licensing of production and utilization facilities."

10 CFR 61. Code of Federal Regulations, Title 10, *Energy*, Part 61, "Licensing requirements for land disposal of radioactive waste."

10 CFR 72. Code of Federal Regulations, Title 10, *Energy*, Part 72, "Licensing requirements for the independent storage of spent nuclear fuel high-level radioactive waste and reactor-related greater-than-Class-C waste."

10 CFR 100. Code of Federal Regulations, Title 10, *Energy*, Part 100, "Reactor site criteria."

61 FR 39278. "Decommissioning of Nuclear Power Reactors. Final Rule." *Federal Register*. July 29, 1996.

64 FR 39058. "Radiological Criteria for License Termination. Final Rule." *Federal Register*. July 21, 1997.

66 FR 46230. "Releasing Part of a Power Reactor Site or Facility for Unrestricted Use Before the NRC Approves the License Termination Plan. Proposed Rule." *Federal Register*. September 4, 2001.

U.S. Nuclear Regulatory Commission (NRC). 1988. *Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities*. NUREG-0586, NRC, Washington, D.C.

3.0 Description of NRC Licensed Reactor Facilities and the Decommissioning Process

This chapter provides information on both the operating nuclear power plants and those being decommissioned. First, a general description of the nuclear power plants and sites is provided in Section 3.1 to help the reader understand the types of reactor facilities that will be decommissioned, the location of the radioactive material in these facilities, and the structures, systems, and components (SSCs) that will be referred to later in this document and that are important in the decommissioning process. Next, the methods that are commonly used during decommissioning are described in Section 3.2. Section 3.3 addresses the decommissioning experience of the currently decommissioning plant sites, their chosen method for decommissioning, and the activities that are being used to decommission the facilities.

There are currently 22 nuclear power reactors at 21 sites that are permanently shut down: 19 of these reactors are in various stages of decommissioning, and reactors at 3 sites have finished decommissioning and no longer maintain a license. The decommissioning efforts at these 22 plants equates to over 200 equivalent years of experience decommissioning commercial power reactors since the 1988 *Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities*, NUREG-0586 (1988 GEIS; NRC 1988) was published. There are also currently 104 nuclear plants that have a license and are either operating or have not yet certified that they have permanently ceased power operations. Between 2006 and 2035, these 104 plants will either permanently cease operations or renew their licenses. Ultimately, they will all permanently cease operations and be decommissioned.

3.1 Plants, Sites, and Reactor Systems^(a)

Between 1957 and 1996, the U.S. Nuclear Regulatory Commission (NRC) issued 126 operating licenses for commercial power reactor operation at 80 sites. The history of and experience with the 22 reactors that are being decommissioned currently or have completed decommissioning are addressed in Section 3.3. Because each of the remaining 104 operating plants will eventually enter the decommissioning process, their attributes and characteristics are included in this section to ensure that this Supplement is appropriate for future decommissioning plants. The material presented in this section is also provided as background information for the reader.

(a) Much of the information in this section was taken from NUREG-1437, *Generic Environmental Impact Statement for License Renewal of Nuclear Plants* (NRC 1996) and from NUREG-1628, *Staff Responses to Frequently Asked Questions Concerning Decommissioning of Nuclear Power Reactors* (NRC 2000a). This information has been supplemented and updated as appropriate to include all operating and currently decommissioning nuclear plants.

Description of Reactors

Nuclear power reactor facilities are located in 35 of the contiguous States, with none in Alaska or Hawaii. Thirty-nine sites contain two or three nuclear power reactors (units) per site. Of the 126 plants, 98 are located east of the Mississippi River with most of the nuclear capacity located in the northeast (New England States, New York, and Pennsylvania), the midwest (Illinois, Michigan, and Wisconsin) and the southeast (Virginia, North and South Carolina, Georgia, Florida, and Alabama).

Typically, nuclear power plants are sited in flat or rolling countryside, in wooded or agricultural areas away from urban areas. Most are located on or near rivers or lakes. Several plants are located in arid regions, and 19 plants are located along the seacoast on bays or inlets. More than 50 percent of the sites have 80-km (50-mile) population densities of less than 77 persons/km² (200 persons/mi²) and over 80 percent have 80-km (50-mile) densities of less than 193 persons/km² (500 persons/mi²). The most notable exception is the Indian Point Station, located within 80 km (50 mi) of New York City, which has a projected 1999 population density within 80 km (50 mi) of more than 770 persons/km² (2000 persons/mi²). Indian Point has one permanently shutdown reactor and two operating reactors.

Site areas range from a minimum of 34 ha (84 ac) for the San Onofre Nuclear Generating Station, (a three unit site, with one permanently shutdown reactor) in California to 9700 ha (24,000 ac) for the Turkey Point Plant in Florida (two operating units). Almost 60 percent of plant sites cover from 200 to 800 ha (500 to 2000 ac). Larger land-use areas are associated with plant cooling systems that include reservoirs, artificial lakes, and buffer areas.

Appendix F contains summary tables for both permanently shutdown and currently operating nuclear power facilities showing location, reactor type, thermal power, site area, cooling system and cooling water source, and licensing dates.

3.1.1 Types of Nuclear Power Reactor Facilities

In the United States, nearly all reactors used for commercial power generation have been conventional (thermal) light water reactors (LWRs) that use water as a moderator and coolant. The two types of LWRs are pressurized water reactors (PWRs) and boiling water reactors (BWRs). Of the 123 LWRs, 80 are PWRs and 43 are BWRs. The three plants that are not LWRs are Fermi, Unit 1, which is a permanently shutdown fast breeder reactor (FBR), and Peach Bottom, Unit 1, and Fort St. Vrain, which are permanently shutdown high-temperature gas-cooled reactors (HTGRs). Fermi, Unit 1, is currently performing the decontamination and

dismantlement phase of SAFSTOR (see Section 3.2). Peach Bottom, Unit 1, is in long-term storage. Fort St. Vrain has had its license terminated following completion of decommissioning activities.

Brief descriptions of these different types of reactors are given below as background.

3.1.1.1 Pressurized Water Reactors

In PWRs, water is heated to a high temperature under pressure inside the reactor. The water is then pumped in the primary circulation loop to the steam generator. Within the steam generator, water in the secondary circulation loop is converted to steam that drives the turbines. The turbines turn the generator to produce electricity. The steam leaving the turbines is condensed by water in the tertiary loop and returned to the steam generator. The tertiary loop water flows either to cooling towers, where it is cooled by evaporation or discharged to a body of water such as a river, lake, or other heat sink. The tertiary loop is open to the atmosphere, but the primary and secondary cooling loops are not (see Figure 3-1).

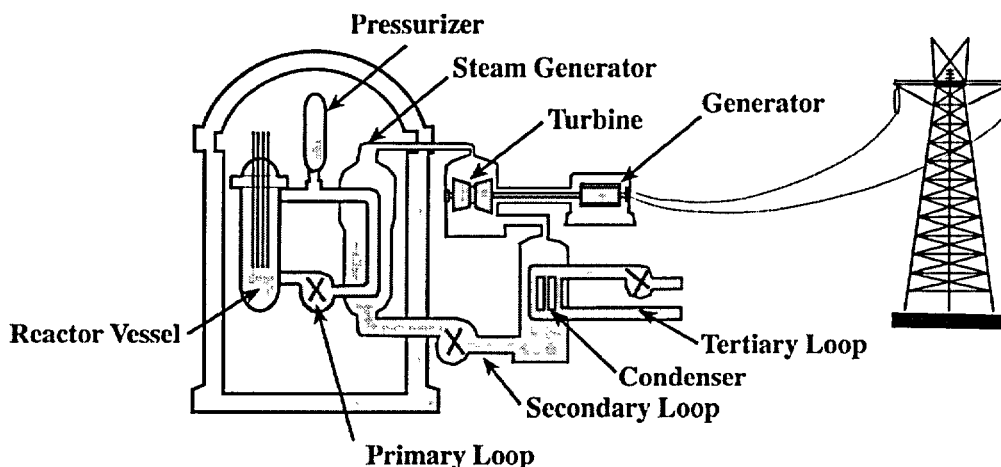


Figure 3-1. Pressurized Water Reactor

3.1.1.2 Boiling Water Reactors

The BWRs generate steam directly within the reactor vessel. The steam passes through moisture separators and steam dryers and then flows to the turbine. By generating steam directly in the reactor vessel, the power generation system contains only two heat transfer loops. The primary loop transports the steam from the reactor vessel directly to the turbine, which generates electricity. The secondary coolant loop removes excess heat from the primary

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loop in the condenser. From the condenser the primary condensate proceeds into the feedwater stage and the secondary coolant loop removes the excess heat to the environment (see Figure 3-2).

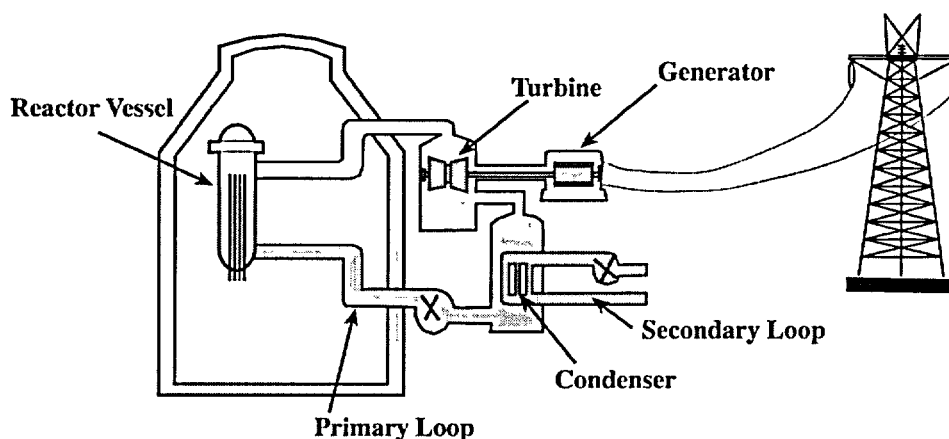


Figure 3-2. Boiling Water Reactor

3.1.1.3 Fast Breeder Reactors

- | In the FBR, such as Fermi, Unit 1, liquid sodium is used as the reactor coolant instead of water.
- | The Fermi, Unit 1, FBR used the fissile isotope of uranium as fuel. During the chain reaction, while some neutrons are fissioning plutonium atoms and releasing heat energy, others are captured by uranium atoms, which are then converted into more plutonium atoms. Depending
- | on design, a fast breeder can produce 1.4 new plutonium atoms for every one fissioned—enough to refuel another reactor in 10 years. Fast breeders also generally have a higher power density in the core (thus, a smaller reactor) and better heat transfer characteristics, which improves power-plant efficiency. The Fermi, Unit 1, reactor also utilized a steam cycle to generate electricity, similar to a PWR. However, the Fermi, Unit 1, reactor had two sodium loops. Primary-loop liquid sodium was circulated through the reactor core, where it absorbed the heat generated by the reactor, and then through a heat exchanger, where its heat was transferred to the second (intermediate) sodium loop. The intermediate-loop liquid sodium was then circulated through a steam generator. The steam produced in the steam generators
- | was then circulated to the turbine generators to produce electricity.

- | At this time, there are no commercial FBRs operating or under construction in the United
- | States. Fermi, Unit 1, is currently in SAFSTOR. The environmental impacts described in this Supplement for FBRs are applicable to Fermi, Unit 1.

3.1.1.4 High-Temperature Gas-Cooled Reactors

Commercial HTGRs, operated in the United States at Peach Bottom, Unit 1, and Fort St. Vrain, use helium gas instead of water (as in LWRs) to transfer the heat from the reactor core to produce steam. In HTGRs, the entire primary coolant system, including the reactor, the steam generators, and the helium circulators, is housed within a prestressed concrete or steel reactor vessel. The helium circulators pump the pressurized coolant through the core, where it absorbs the heat from the fission process. The helium then enters the steam generators, which transfer the heat to the secondary system. The secondary system is a steam cycle similar to that found in any modern fossil-fuel facility. Superheated steam is produced in the steam generators and routed to the turbine generator, which generates the electricity (Fuller 1988).

At this time, there are no HTGRs operating or under construction in the United States. Decommissioning at Fort St. Vrain is complete and the license is terminated, and Peach Bottom, Unit 1, is currently in SAFSTOR. The environmental impacts described in this Supplement for HTGRs are applicable to Peach Bottom, Unit 1.

3.1.2 Types of Structures Located at a Nuclear Power Facility

As discussed in Chapter 1, the definition of decommissioning includes the reduction of residual radioactivity to a level that permits release of the property and termination of the license. As a result, the decontamination and/or dismantlement of those SSCs that are radioactive are, by definition, included within the scope of this Supplement as part of decommissioning. If the structures must be decontaminated or parts of the structures removed to meet the requirements for the termination of the NRC license, those activities are also considered within scope as part of the decommissioning process. This includes removing nonradiological structures necessary to decontaminate another structure. Additionally, the impacts of dismantling all SSCs that were built or installed at the site to support power production are considered in this Supplement. This section discusses all the structures that will be referred to later in the document as background information for the reader.

Nuclear power plants generally contain similar facilities. They all contain a nuclear steam supply system, as described in Section 3.1.1 above. Additionally, there are a number of common SSCs necessary for plant operation. However, the layout of buildings and structures varies considerably among the sites. For example, control rooms may be located in the auxiliary building, in a separate control building, or in a radwaste and control building. Thus, the following list describes typical structures located on most sites.

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- Containment or reactor building: The containment or reactor building in a PWR is a massive concrete or steel structure that houses the reactor vessel, reactor coolant piping and pumps, steam generators, pressurizer, pumps, and associated piping. The reactor building structure of a BWR generally includes a containment structure and a shield building. The containment is a massive concrete or steel structure that houses the reactor vessel, the reactor coolant piping and pumps, and the suppression pool. It is located inside a somewhat less substantive structure called the shield building. The shield building for a BWR also generally contains the spent fuel pool and the new fuel pool.

The reactor building for both PWRs and BWRs is designed to withstand such disasters as hurricanes and earthquakes. The containment's ability to withstand such disasters and to contain the effects of accidents initiated by system failures are the principal protections against releasing radioactive material to the environment.

- I The containment building for the FBR is a steel-domed structure that contains the upper
- I end of the reactor vessel and the fuel-handling equipment. Below ground there is considerable concrete shielding.

The HTGRs have two containment structures. Peach Bottom's inner containment structure is made of a steel pressure vessel and Fort St. Vrain's was made of prestressed concrete. This inner vessel houses the entire primary coolant system, the interconnecting ducts and plenums, the reactor core assembly, and the steam generator. The inner vessel is housed inside a second containment structure, which is designed to contain the entire primary coolant system helium under conditions postulated for the design basis accident.

- Fuel building: For PWRs, the fuel building has a fuel pool that is used for the storage and servicing of spent fuel and the preparation of new fuel for insertion into the reactor. This building is connected to the reactor building by a transfer tube or channel that is used to move new fuel into the reactor and to move spent fuel out of the reactor for storage.
- Turbine building: The turbine building houses the turbine generators, condenser, feedwater heaters, condensate and feedwater pumps, waste-heat rejection system, pumps, and equipment that supports those systems. Primary coolant is circulated through these
- I systems in BWRs, thereby causing them to become slightly contaminated. Primary coolant
- I is not circulated through the turbine building systems in PWRs. However, it is not unusual
- I for portions of the turbine building to become mildly contaminated during power generation at PWRs.

- Auxiliary buildings: Auxiliary buildings house such support systems as the ventilation system, the emergency core cooling system, the laundry facilities, water treatment system, and waste treatment system. The auxiliary building may also contain the emergency diesel generators and, in some PWRs, the fuel storage facility. Often, the facility's control room is also located in the auxiliary building.
- Diesel generator building: Often, there is a separate building for housing the emergency diesel generators if they are not located in the auxiliary building. The emergency diesel generators do not become contaminated or activated.
- Pumphouses: Various pumphouses may be present onsite for circulating water, standby service water, or makeup water. Pumphouses that carry clean water do not require radiological decommissioning.
- Cooling towers: Cooling towers are structures that are designed to remove excess heat from the condenser without dumping the heat directly into water bodies, such as lakes or rivers. There are two principal types of cooling towers: mechanical draft towers and natural draft towers. Most nuclear plants that have once-through cooling do not have cooling towers associated with them (see the descriptions in Section 3.1.3). However, five facilities with once-through cooling also have cooling towers.
- Radwaste facilities: If the radwaste facilities are not contained in the auxiliary building, they may be located in a separate solid radwaste building. An interim radwaste storage facility may also be used.
- Ventilation stack: Many older nuclear power plants, particularly BWRs, have ventilation stacks to discharge gaseous waste effluents and ventilation air. These stacks can be 90 m (300 ft) tall or more and contain monitoring systems to ensure that radioactive gaseous discharges are below fixed release limits. Radioactive gaseous effluents are treated and processed prior to discharge out the stack.

The following structures may also be part of the nuclear reactor facility but are not evaluated in this Supplement.

- Independent spent fuel storage installations (ISFSI): An ISFSI is designed and constructed for the interim storage of spent nuclear fuel and other radioactive materials associated with spent fuel storage. ISFSIs may be located at the site of a nuclear power plant or at another location. The most common design for an ISFSI, at this time, is a concrete pad with dry casks containing spent fuel bundles. ISFSIs are used by operating plants that require increased spent fuel storage capability because their spent fuel pools have reached

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capacity. Decommissioning facilities also use ISFSIs. The first dry-storage installation was licensed by the NRC in 1986. As of August 21, 2002, there were 23 nuclear power facilities licensed to use dry storage: Surry, Oconee, H.B. Robinson, Calvert Cliffs, Fort St. Vrain, Palisades, Point Beach, Prairie Island, Davis-Besse, Susquehanna, Arkansas Nuclear One, North Anna, Trojan, Dresden, Hatch, McGuire, Oyster Creek, Peach Bottom, Yankee Rowe, Fitzpatrick, Rancho Seco, Maine Yankee, and U.S. Department of Energy (DOE [TMI-2 fuel debris]) at Idaho National Engineering and Environmental Laboratory.

An ISFSI can be constructed and operated and decommissioned either under the same license that is used for the operating or decommissioning facility called a general license under 10 CFR Part 50 or a specific license under 10 CFR Part 72 license. If a licensee chose to operate the ISFSI under a Part 50 license, it could, seek a site-specific 10 CFR Part 72 license for the ISFSI, thus allowing termination of the Part 50 license at the end of the decommissioning process. The NRC staff would also be required to conduct an environmental assessment of the licensee's request for a site-specific 10 CFR Part 72 license.

- Switchyard: A plant site also contains a large switchyard, where the electric voltage is stepped up and fed into the regional power distribution system. The switchyard is an integral part of the electric power transmission grid, and may remain on the site even after termination of the license.
- Administrative, training, and security buildings: Normally, the administrative, training, and security buildings are located outside the radiation protection zones, and no radiological hazards are present.

3.1.3 Description of Systems

After permanent cessation of operations and transfer of the fuel from the reactor vessel, licensees begin to shut down systems that are no longer operated in a decommissioning plant. However, specific systems will continue to be used during the different phases of the decommissioning process although in some cases in reduced roles. This section provides background information related to the systems, explains the differences between the systems' use during operations and during the decommissioning process, and explains how their continued operation could impact the environment during the decommissioning process. Lobner et al. (1990) provides more comprehensive descriptions of these systems in U.S. commercial LWRs. The systems described below are typical and may differ at specific facilities.

- Cooling and auxiliary water systems: The predominant water use at an operating nuclear power plant is for removing excess heat generated in the reactor by the condenser cooling system. The quantity of water that is used for condenser cooling in an operating plant is a function of several factors, including the capacity rating of the plant and the increase in cooling water temperature from the discharge to the intake. The cooling water system for the reactor is not operated after the facility has permanently ceased power operations and the fuel has been removed from the reactor vessel. Therefore, water use is greatly reduced when operations cease. However, systems are not immediately drained upon cessation of operation and are frequently left in place for a period of time to provide shielding to the workers.

There are two major types of cooling systems for operating plants: once-through cooling and closed-cycle cooling.

In a once-through cooling system, circulating water for condenser cooling is obtained from an adjacent body of water, such as a lake or river, passed through the condenser tubes, and returned at a higher temperature to the adjacent body of water. Flow through the condenser for a 1000-MW plant during operations is typically 45 to 65 m³/s (700,000 to 1,000,000 gpm) (NRC 1996). The waste heat is dissipated to the atmosphere mainly by evaporation from the water body and, to a much smaller extent, by conduction, convection, and thermal radiation loss.

In a closed-cycle system at an operating plant, the cooling water is recirculated through the condenser after the waste heat is removed by dissipation to the atmosphere, usually by circulating the water through large cooling towers constructed for that purpose. The average for makeup water withdrawals for a 1000-MW plant during operations is typically about 0.9 to 1.1 m³/s (14,000 to 18,000 gpm). Recirculating cooling systems consist of either natural draft or mechanical draft cooling towers, cooling ponds, lakes, or canals. Because the predominant cooling mechanism associated with closed-cycle systems is evaporation, most of the water used for cooling is consumed and is not returned to the water source.

In addition to removing heat from the reactor of an operating facility, cooling water is also provided to the service water system and to the auxiliary water system. These systems account for 1 to 15 percent of the water needed for the condenser cooling. The auxiliary water systems include emergency core cooling systems, the containment spray and cooling system, the emergency feedwater system, the component cooling water system, and the spent fuel pool water systems. Most of these systems would not be needed following permanent cessation of operations. However, some, such as the systems for the spent fuel pool cooling, will be used after the plant has shut down.

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- Waste systems (gaseous, liquid, solid, and nonradioactive): The gaseous waste management system in an operating nuclear facility collects fission products, mainly noble gases, that accumulate in the primary coolant. It is designed to reduce the radioactive material in gaseous waste before discharge to meet the dose design objectives in 10 CFR Part 50, Appendix I. During decommissioning, the gaseous waste management system is used during the decontamination and dismantlement of certain tanks or pipes. It is also used during dismantlement to assist in the control of radioactive dust or loose contamination. In addition, high-efficiency particulate air (HEPA) filters are used to remove radioactive material on a localized basis. For example, when removing concrete with a power hammer or drill in the containment building, a temporary plastic tent equipped with a HEPA filter, prevents contaminated dust particles from entering the building. A second set of HEPA filters is located on the exhaust vent pathway for the building. The quantities of gaseous effluents released from operating plants and those in the decommissioning process are controlled by the administrative limits that are defined in the Offsite Dose Calculation Manual (ODCM) or similar document, which is specific for each plant. The limits in the ODCM are designed to provide reasonable assurance that radioactive material discharged in gaseous effluents are not in excess of the limits specified in 10 CFR Part 20, Appendix B, thereby limiting the exposure of a member of the public in an unrestricted area.

The liquid radioactive waste system in operating nuclear power plants is used to collect and process liquid wastes collected from equipment leaks, valve and pump seal leaks, laundry wastes, personnel and equipment wastes, and steam generator blowdown (for PWRs), as well as building, laboratory, and floor drains. Each of these sources of liquid wastes receives varying degrees and types of treatment before storage, reuse, or discharge to the environment. During decommissioning, any radioactive liquids from operation of decommissioning activities in the facility will be processed and disposed of, thus necessitating the use of the liquid radioactive waste system. Some systems such as the laundry will likely still operate for a period of time, but others like the steam generator blowdown will not. Controls for limiting the release of radiological liquid effluents are described in the facility's ODCM. Controls are based on (1) concentrations of radioactive materials in liquid effluents and projected dose or (2) dose commitments to a member of the public. Concentrations of radioactive material that may be released in liquid effluents to unrestricted areas are limited to the concentration specified in 10 CFR Part 20, Appendix B, Table 2.

Solid low-level waste (LLW) from nuclear power plants is generated by removal of radionuclides from liquid waste streams, filtration of airborne gaseous emissions, and removal of contaminated material. The major source of solid LLW during decommissioning is the decommissioning process itself. Removal of contamination involves the use of protective clothing and cleaning rags. Dismantlement results in concrete or metal that has

low levels of contamination or activation products. While the amount of liquid and gaseous radioactive waste generated is usually lower for decommissioning plants than for operating plants, the quantity of solid LLW being generated is significantly higher during decommissioning.

Solid waste is packaged in containers to meet the applicable requirements of 49 CFR Parts 171 through 177. Disposal and transportation are performed in accordance with the applicable requirements of 10 CFR Part 61 and 10 CFR Part 71, respectively.

Solid radioactive waste generated during either decommissioning or operations is usually shipped to a LLW processor or, in some cases, directly to a LLW disposal site. Volume reduction may occur both onsite and offsite. The most common onsite volume reduction techniques are high-pressure compacting in waste drums, dewatering and evaporating wet wastes, monitoring waste streams to segregate wastes, and sorting. Offsite waste management vendors compact wastes at ultra-high pressures, incinerate dry active waste, separate and incinerate oily and organic wastes, and asphalt-solidify resins and sludges before the waste is sent to the LLW site.

Nonradioactive wastes, including storm water system and sewage waste, are also generated during the decommissioning process. For example, use of hazardous oils or other chemicals in solvent cleaning and repair of equipment produces some nonradioactive wastes. Also, during decommissioning, additional quantities of nonradioactive waste (paint, asbestos) are generated or removed. Disposal of essentially all of the hazardous chemicals used at nuclear power plants is regulated by the Resource Conservation and Recovery Act (RCRA) of 1976 or by National Pollutant Discharge Elimination System (NPDES) permits, which are regulated by the U.S. Environmental Protection Agency (EPA) and administered by EPA, or if authorized, by the States to control the amount and types of pollutants that may be discharged from the plant.

Mixed waste is regulated under RCRA, the Atomic Energy Act, and NRC and is sent to a facility that is licensed to handle mixed waste.

- Miscellaneous mechanical systems: A variety of existing plant mechanical systems may continue to be used during plant decommissioning, including
 - the fire protection system
 - the heating, ventilation, and air conditioning (HVAC) system

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- the fuel-handling system
- various cranes and hoists.

The use of these systems generally does not have a direct impact on the environment. For example, the HVAC system that is used inside a contaminated area would be exhausted to the gaseous waste management system.

- Instrumentation and control systems: While most instrumentation and control systems in the plant can be deactivated after permanent shutdown and defueling of the reactor, a few may continue to be used to support decommissioning operations, including:
 - the radiation monitoring system, which detects, measures, and records radiation levels during decommissioning operations and alerts plant staff of off-normal readings, and
 - the security system, which monitors the plant protected area to prevent uncontrolled access.

In most cases, these systems are altered or reduced during the decommissioning process. The use of these systems during the decommissioning process does not impact the environment.

- Electrical systems: Numerous electrical systems may continue to be used during decommissioning operations. These include systems needed to provide uninterrupted power, lighting, and communication. In some cases, licensees have installed a new power distribution system, re-energizing only those loads that are necessary for continued use during decommissioning. In many facilities, the circuits that are being used are color-coded so that workers can easily identify the live circuits. Both of these practices are intended to prevent workers from cutting into a live wire during the decommissioning process.
- Spent fuel storage systems: Before beginning the decommissioning process, the licensee must certify to the NRC that it has permanently removed the fuel from the reactor vessel. The fuel is first moved into the spent fuel pool, which is a specially designed water-filled basin. Even after the nuclear reactor is shut down, the fuel continues to generate decay heat from the radioactive decay of fission products. The rate at which the decay heat is generated decreases the longer the reactor has been shut down. Therefore, the longer the time from last criticality, the less heat the spent fuel gives off. Storing the spent fuel in a pool of water provides an adequate heat sink for the removal of heat from the irradiated fuel. In addition, the fuel is located far enough under water that the radiation emanating from the fuel is shielded by the water, thus protecting workers from the radiation. After the

fuel has cooled adequately, it can be stored in an ISFSI in air-cooled dry casks. Typically, transfer of spent fuel to an ISFSI occurs after the fuel has cooled for 5 years.

After removal of the fuel to the spent fuel pool, it is common for the licensee to reduce the security area at the facility to a "nuclear island" that focuses primarily on the storage area for the spent fuel. This allows the spent fuel to be protected and the security system to cover only the storage location for the spent fuel.

At this time, there are no facilities for permanent disposal of high-level radioactive wastes (HLW). The Nuclear Waste Policy Act of 1982 defined the goals and structure of a program for permanent, deep geologic repositories for HLW and unprocessed spent fuel. Under this Act, the DOE is responsible for developing permanent disposal capacity for the spent fuel and other high-level nuclear wastes. At the present time, DOE, as directed by Congress, is investigating a site in Yucca Mountain, Nevada, for a possible disposal facility. A HLW repository would be built and operated by DOE and licensed by the NRC.

The Commission believes (10 CFR 51.23(a)) there is reasonable assurance that at least one mined geological repository will be available in the first quarter of the 21st Century and that, within 30 years beyond the licensed life of operation for any reactor, sufficient repository capacity will be available to dispose of the reactor's HLW and spent fuel generated up to that time.

Until a HLW repository is available or some interim central waste storage facility is approved and licensed, licensees generally store the fuel onsite, either in dry storage (ISFSI) or in wet storage in a spent fuel pool. Licensees are prohibited from shipping spent fuel from one reactor spent fuel pool to another without NRC approval by license amendment.

The Commission has independently, in a separate proceeding (the Waste Confidence Proceeding), made a finding that there is

reasonable assurance that, if necessary, spent fuel generated in any reactor can be stored safely and without significant environmental impacts for at least 30 years beyond the licensed life for operation (which may include the term of a revised license) of that reactor at its spent fuel storage basin, or at either onsite or offsite independent spent fuel storage installations (54 FR 39767).

The Commission has committed to review this finding at least every 10 years. In its most recent review, the Commission concluded that experience and developments since 1990 were not such that a comprehensive review of the Waste Confidence Decision was necessary at this time (64 FR 68005). Accordingly, the Commission reaffirmed its findings

Description of Reactors

of insignificant environmental impacts cited above. This finding is codified in the Commission's regulations at 10 CFR 51.23(a). The staff relies on the Waste Confidence Rule, but for completeness has elected to include in this Supplement information related to the storage and maintenance of fuel in a spent fuel pool.

- Transportation systems: There are four broad classes of shipments to and from operating nuclear power plants: (1) routinely generated LLW transported from plants to disposal facilities, (2) routine LLW shipped to offsite facilities for volume reduction, (3) nuclear fuel shipments from fuel-fabrication facilities to plants for loading into reactors, and (4) spent fuel shipments to other nuclear power plants with available storage space (an infrequent occurrence that is usually limited to plants owned by the same utility).

The transportation of radioactive materials is regulated jointly at the Federal level by the U.S. Department of Transportation (DOT) and the NRC. The responsibilities of the two agencies are delineated in a Memorandum of Understanding (see 44 FR 38690). Most LLW is shipped in packages authorized by the DOT. Some packages for larger quantities of LLW require NRC certification. The LLW packages can be loaded onto trucks, trains, barges, or other ships for shipment to the LLW disposal site. In general, the areas regulated by the agencies are as follows:

- DOT – Regulates shippers and carriers of radioactive material and the conditions of transport, including routing, tiedowns, radiological controls, vehicle requirements, hazard communication, handling, storage, emergency response information, and employee training. DOT regulations are located in the Code of Federal Regulations, Title 49, "Transportation."
- NRC – Regulates users of radioactive material and the design, construction, use, and maintenance of shipping containers used for larger quantities of radioactive material and fissile material such as uranium. NRC regulations are located in 10 CFR Part 71, "Packaging and Transportation of Radioactive Material."

Title 10 CFR 71.47 states that under normal transportation conditions, each package of radioactive materials must be designed and prepared for shipment such that the radiation level does not exceed 2 mSv/h (200 mrem/h) at any point on the external surface of the package and 0.1 mSv/h (10 mrem/h) at any point 1 m (3.3 ft) from the packaging surface. This type of shipment is called a nonexclusive use shipment. If the package exceeds the limits specified for nonexclusive use shipments, it must be transported by exclusive use shipment only. The radiation limits for exclusive use packages are the following:

- At any point on the package surface: 2 mSv/h (200 mrem/h). For closed transport vehicle only: 10 mSv/h (1000 mrem/h)
- At 2 m (6.6 ft) from lateral surfaces of vehicle: 0.1 mSv/h (10 mrem/h)
- At all external surfaces of the vehicle: 2 mSv/h (200 mrem/h)
- In the occupied area of the vehicle: 0.02 mSv/h (2 mrem/h), with certain exceptions.

For more information regarding waste packaging and radioactive transportation regulations, see 10 CFR Part 71.

The frequency of waste shipments increases sharply during the decommissioning period. In some cases, such as the shipment of large components (e.g., steam generators, reactor vessels, or pressurizers), the waste packaging is unique compared to most shipments during operations. However, the licensee is still required to meet the regulations discussed above, unless the NRC approves an exemption after a thorough analysis of the licensee's proposal.

3.1.4 Formation and Location of Radioactive Contamination and Activation in an Operating Plant

During reactor operation, a large inventory of radioactive fission products builds up within the fuel. Virtually all of the fission products are contained within the fuel pellets. The fuel pellets are enclosed in hollow metal rods, which are hermetically sealed to prevent further release of fission products. Occasionally fuel rods develop small leaks, allowing a small fraction of the fission products to contaminate the reactor coolant. The radioactive contamination in the reactor coolant is the source of gaseous, liquid, and solid radioactive wastes generated at LWRs during operation. Most of the contamination in the reactor coolant system is from the activation of corrosion products and not from leaking fuel.

There are two sources of radioactive material: contamination and activation. Contaminated materials are unintentionally transported through the facility by workers, equipment, and, to some degree, air movement. Although many precautions are taken to prevent the movement of contaminated material in a nuclear facility and to clean up any contaminated materials that may be found, it is likely that contamination will occur in the reactor building, around the spent fuel pool, and around specific SSCs in the auxiliary building and other buildings and equipment in the area near the reactor. The areas known to contain contamination are labeled by the licensee, who routinely checks for contamination and removes as much as possible during operations. Radioactive contamination may be deposited from the air or dissolved in water and subsequently deposited onto material such as concrete. Radioactive contamination is generally

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located on or near the surface of materials such as metals, high-density concrete, or painted walls. It can travel farther into unpainted surfaces or lower-density concrete. Radioactive contamination can usually be removed from surface areas by washing, scrubbing, spraying, or, in extreme cases, by physically removing the outer layers of the surface material.

Activation products are also formed during reactor operation. Activation products are radioactive materials created when stable substances are bombarded by neutrons. Concrete and steel surrounding the core of the reactor are the most common types of activated products. Activation products cannot be removed by the processes used to remove contamination.

Activation products are incorporated into the molecular structure of the material and cannot be wiped off or removed. The entire structure (or portions) that have been activated must be removed and treated as radioactive waste. Activated metal and concrete contain the single largest inventory of radionuclides with the exception of the spent fuel, in facilities that are being decommissioned. The radioactive decay of activation products, both of structures as well as corrosion products, is the main source of radiation exposure to plant personnel.

The spent fuel contains the largest amount of radioactive material at a permanently shutdown facility followed by the reactor vessel, internals, and bioshield. Systems containing smaller amounts of radioactive material include the steam generator, pressurizer, piping of the primary system and other systems, piping, as well as the radwaste systems. Minor contamination is found in the secondary systems and miscellaneous piping.

3.2 Decommissioning Options

This Supplement evaluates the environmental impacts of three decommissioning options or combinations of the options. These options, first identified in the 1988 Generic Environmental Impact Statement (GEIS) using the acronyms DECON, SAFSTOR, and ENTOMB, are defined as follows:

DECON: The equipment, structures, and portions of the facility and site that contain radioactive contaminants are promptly removed or decontaminated to a level that permits termination of the license shortly after cessation of operations.

SAFSTOR: The facility is placed in a safe, stable condition and maintained in that state (safe storage) until it is subsequently decontaminated and dismantled to levels that permit license termination. The determination of SAFSTOR includes those activities necessary for the final decontamination and dismantlement of the facility. During SAFSTOR, a facility is left intact, but the fuel has been removed from the reactor vessel, and radioactive liquids have been drained from systems and components and then processed. Radioactive decay

occurs during the SAFSTOR period, thus reducing the quantity of contaminated and radioactive material that must be disposed of during decontamination and dismantlement. The definition of SAFSTOR also includes the decontamination and dismantlement of the facility at the end of the storage period.

ENTOMB: Radioactive SSCs are encased in a structurally long-lived substance, such as concrete. The entombed structure is appropriately maintained, and continued surveillance is carried out until the radioactivity decays to a level that permits termination of the license.

The choice of decommissioning option is left entirely to the licensee, provided that it can be performed according to the NRC's regulations. This choice is communicated to the NRC and the public in the post-shutdown decommissioning activities report (PSDAR). In addition, the licensee may choose to combine the DECON and SAFSTOR options. For example, after power operations cease at a facility, a licensee could use a short storage period for planning purposes, followed by removal of large components (such as the steam generators, pressurizer, and reactor vessel internals), place the facility in storage for 30 years, and eventually finish the decontamination and dismantlement process.

Although the selection of the decommissioning option is up to the licensee, the NRC requires the licensee to re-evaluate its selection if the option (1) could not be completed as described, (2) could not be completed within 60 years of the permanent cessation of plant operations, (3) included activities that would endanger the health and safety of the public by being outside of the NRC's health and safety regulations, or (4) would result in a significant impact to the environment.

To date, most utilities have used DECON or SAFSTOR to decommission reactors. Several sites have performed some incremental decontamination and dismantlement during the storage period of SAFSTOR, a combination of SAFSTOR and DECON. A site using DECON may have a short period of time (1 to 4 years) when the facility is in SAFSTOR. Several licensees continue to conduct limited decommissioning activities during a SAFSTOR period as personnel, money, or other factors become available. This process of occasionally conducting active decontamination and dismantlement is referred to as incremental DECON. No utilities have used the ENTOMB option for a commercial nuclear power reactor.

The following sections provide a general overview of each decommissioning option.

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3.2.1 DECON

The DECON decommissioning option involves removing or decontaminating equipment, structures, and portions of the facility and site that contain radioactive contaminants to a level that permits termination of the license, as defined in Regulatory Guide 1.184 (NRC 2000a).

There are several advantages to using the DECON option of decommissioning. One is that the facility license is quickly terminated so that the facility and site become available for other purposes. By beginning the decontamination and dismantlement process soon after permanent cessation of operation, the available work force can be maintained and is highly knowledgeable about the facility. The availability of facilities willing to accept LLW may also be a factor in the licensee's decision to pursue the DECON option. Currently, the estimated cost of decommissioning a site using DECON is less than SAFSTOR due primarily to price escalation in the disposal of LLW. Because most activities that occur during DECON also occur during SAFSTOR, the price for decommissioning at a later date is greater because of the cost of storage and inflation (NRC 2000c). DECON also eliminates the need for long-term security, maintenance, and surveillance of the facility (excluding the onsite storage of spent fuel), which is required for the other decommissioning options.

The major disadvantages of DECON are the higher worker dose and significant initial expenditures. Also, compared to SAFSTOR, DECON requires a larger potential commitment of disposal site space (NRC 2000c).

The general activities that may occur during DECON are listed below (NRC 2000d):

- draining (and potentially flushing) of some contaminated systems and removal of resins from ion exchangers
- setup activities such as establishing monitoring stations or designing and fabricating special shielding and contamination-control envelopes to facilitate decommissioning activities
- reduction of site-security area (setup of new security monitoring stations)
- modification of the control room or establishing an alternate control room
- site surveys
- decontamination of radioactive components, including use of chemical decontamination techniques

- removal of reactor vessel and internals
- removal of other large components, including major radioactive components
- removal of the balance of the primary system (charging system, boron control system, etc.)
- general activities related to removing other significant radioactive components
- decontamination and/or dismantlement of structures or buildings
- temporary onsite storage of components
- shipment and processing of LLW, including compaction or incineration of the waste
- removal of the spent fuel and Greater-than-Class-C (GTCC) Waste to an ISFSI
- removal of hazardous radioactive (mixed) wastes
- changes in management and staffing.

3.2.2 SAFSTOR

The SAFSTOR decommissioning option involves placing the facility in a safe, stable condition and maintaining that state for a period of time, followed by subsequent decontamination and dismantlement to levels that permit license termination. During the storage period of SAFSTOR, the facility is left intact. The fuel has been removed from the reactor vessel and radioactive liquids have been drained from systems and components and processed. Radioactive decay occurs during the storage period, reducing the quantity of contaminated and radioactive material that must be disposed of during decontamination and dismantlement.

There are several advantages to using the SAFSTOR option of decommissioning. A substantial reduction in radioactive material as a result of radioactive decay during the storage period reduces worker and public doses below those of the DECON alternative. Since there is potentially less radioactive waste, less waste-disposal space is required. Moreover, the costs immediately following permanent cessation of operations are lower than costs during the first years of DECON because of reduced amounts of activity and a smaller work force (NRC 2000c).

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However, because of the time gap between cessation of operations and decommissioning activities, SAFSTOR can result in a shortage of personnel familiar with the facility at the time of dismantlement and decontamination. During the prolonged period of storage, the plant requires continued maintenance, security, and surveillance. Also, uncertainties regarding the availability and cost of LLW sites in the future could mean higher costs for decontamination and dismantlement (NRC 2000c).

Activities that typically occur during the preparation and storage stages of the SAFSTOR process are described below (NRC 2000d).

During preparation:

- draining (and potential flushing) of some systems and removal of resins from ion exchangers
- spent fuel pool cooling systems reconfiguration
- decontamination of highly contaminated and high dose areas as necessary
- performance of a radiological assessment as a baseline before storage
- removal of LLW that is ready to be shipped
- shipment and processing or storage of the fuel and GTCC waste
- de-energizing or deactivating systems and equipment
- reconfiguration of ventilation systems, fire protection systems, and spent fuel pool cooling system for use during storage
- establishment of inspection and monitoring plans for use during storage
- maintenance of any systems critical to final dismantlement during storage
- changes in management and staffing.

During storage:

- performance of preventative and corrective maintenance on plant systems that will be operating and/or functional during storage

- maintenance to preserve structural integrity
- maintenance of security systems
- maintenance of radiation effluent and environmental monitoring programs
- processing of any radwaste generated (usually small amounts).

Following the storage period, the facility is decontaminated and dismantled to radiological levels that allow termination of the license. Activities during this period of time will be the same activities that occur for DECON.

3.2.3 ENTOMB

The ENTOMB decommissioning method was defined in the Supplementary Information to the 1988 Decommissioning Rule (53 FR 24018) as the option in which radioactive contaminants are encased in a structurally long-lived material, such as concrete. The entombed structure is appropriately maintained and surveillance is continued until the radioactivity decays to a level permitting unrestricted release of the property (NRC 1988).

Currently, 10 CFR 50.82 (a)(3) requires that decommissioning be completed within 60 years of permanent cessation of operations, and completion of decommissioning beyond 60 years be approved by the NRC only when necessary to protect public health and safety. The factors that could be considered by the Commission in evaluating an option that provides for the completion of decommissioning beyond 60 years of permanent cessation of operation include unavailability of waste disposal capacity and site-specific factors affecting the licensee's capability to carry out decommissioning, including the presence of other nuclear facilities at the site.

The current regulations, pertaining to the decommissioning of nuclear reactors promulgated in 1988, are also structured to favor decommissioning options that result in unrestricted release of the site. As noted in the supplementary information for the June 27, 1988, final rule, the ENTOMB option was not specifically precluded because it was recognized that it might be an allowable option for protecting public health and safety.

The 1997 Rule for Radiological Criteria for License Termination (64 FR 39058) established criteria (10 CFR Part 20, Subpart E) that allow for both restricted and unrestricted release of property. Under a restricted release, the dose to the average member of the critical group must not exceed 0.25 mSv/yr (25 mrem/yr) total effective dose equivalent (TEDE) and must be as low as reasonably achievable (ALARA) with the restrictions in place. If the restrictions were no longer in effect, the dose due to residual radioactivity could not exceed 1 mSv/yr (100 mrem/yr)

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(or 5 mSv/yr [500 rem/yr], if additional conditions are met) TEDE and must be ALARA. These caps were chosen to provide a safety net in the highly unlikely event that the restrictions failed.

In the Staff Requirements Memorandum on the ENTOMB option, dated July 20, 2000 (NRC 2000b), the Commission directed that

[T]he staff closely coordinate this rulemaking effort for this rulemaking with the ongoing efforts to update the generic environmental impact statement for the decommissioning of power reactors. The staff should include the entombment option in the GEIS recognizing that not all entombment proposals can be forecast but that the GEIS would provide a bounding analysis. The staff should also address the issue of entombing Greater Than Class C waste for this category of waste.

On September 18, 2001, the Commission approved the staff's rulemaking plan (see Section 2.2.2) for potential development of a rule to allow entombment as a decommissioning option for power reactors. NRC published an Advance Notice of Proposed Rulemaking (ANPR) on October 16, 2001 (66 FR 52551) seeking stakeholder input on three proposed regulatory options and whether entombment was a viable decommissioning alternative. The ANPR comment period closed on December 31, 2001. NRC received 19 comments from: six States; eight licensees; the Nuclear Energy Institute (NEI); the U.S. Environmental Protection Agency (EPA); the Conference of Radiation Control Program Directors' E-24 Committee on Decommissioning and Decontamination (CRCPD E-24 Committee); the Southeast Compact Commission (SCC); and a private individual.

Generally, the eight utilities and NEI stated that they would have entombment available as a decommissioning option; however, none unequivocally committed to using entombment for their decommissioning process. Some Agreement State commenters endorsed the 10 CFR Part 20 dose limits, with one State adding that a time limit to reach the dose rates should be considered. Although one State advocated extending the decommissioning period beyond 60 years, most were silent on the decommissioning regulations in 10 CFR Part 50. The staff notes that there was no consensus on a preferred option. NRC staff has considered the comments received and has prepared a paper transmitting the staff's recommendations to the Commission. As of the date of this publication the Commission has not acted on the staff's recommendations.

- I The assessment of impacts associated with the ENTOMB option presented in this GEIS is independent of a prospective rulemaking before the Commission. The staff is making the assumption that environmental issues arising from any rulemaking effort will be addressed in the rulemaking and its supporting environmental documentation. These issues may include: (1) the long-term onsite retention of radioactive materials, including those that may be classified

as GTCC, (2) issues related to long-term NRC oversight and monitoring requirements, (3) durability of institutional controls and site-engineered barriers, and (4) site-specific requirements.

The purpose of the entombment process is to isolate the entombed radioactive waste so that the reactor facility can be released and the license terminated. Therefore, prior to entombment, (1) an accurate characterization of the radioactive materials that are to remain is needed, and (2) the adequacy of the entombment configuration to isolate the entombed radioactive waste must be determined. Because of the requirement in the regulation to complete decommissioning within 60 years, no licensee has proposed the use of ENTOMB as the preferred decommissioning option for any of the nuclear power reactors currently undergoing decommissioning. The staff can envision a large number of entombment scenarios arranged along a continuum, differing primarily on the amount of decontamination and dismantlement done prior to the actual entombment.

The staff evaluated the impacts associated with the entombment options by developing two scenarios that have been designated ENTOMB1 and ENTOMB2. These two scenarios were developed specifically to envelope a wide range of potential options by describing two possible extreme cases of entombment. ENTOMB1 assumes significant decontamination and dismantlement and removal of all contamination and activation involving long-lived radioactive isotopes prior to entombment. ENTOMB2 assumes significantly less decontamination and dismantlement, significantly more engineered barriers, and the retention onsite of long-lived radioactive isotopes. Both options assume that the spent fuel would be removed from the facility and either transported to a permanent HLW repository or placed in an onsite ISFSI. Licensees choosing ENTOMB will adapt the entombment option to fit their specific site requirements.

ENTOMB1 is envisioned by the staff to begin the decommissioning process in a manner similar to the DECON option. The reactor would be defueled and the fuel initially placed into the spent fuel pool for some period prior to disposal at a licensed HLW repository or placed in an onsite ISFSI. Any decommissioning activity would be preceded by an accurate radiological characterization of SSCs throughout the facility. Active decommissioning would begin with draining and decontamination of SSCs throughout the facility with the goal of isolating and fixing contamination. SSCs would either be decontaminated or removed and either shipped to a LLW burial site or placed inside the reactor containment building. Offsite disposal of resins and considerable amounts of contaminated material would occur. There would likely be a chemical decontamination of the primary system. The reactor pressure vessel (RPV) and reactor internals would be removed, either intact or after sectioning, and disposed of offsite.

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Any other SSCs that have long-lived activation products would be removed. Interim dry storage of the vessel, vessel internals, and any other SSCs containing long-lived activation products could occur onsite until a final disposal site for this waste (predominately GTCC waste) is identified. Steam generators and the pressurizer, depending on whether or not the components are contaminated with long-lived radioisotopes, would either be removed and disposed of offsite or retained inside the reactor containment. The spent fuel pool would be drained and decontaminated. The reactor building or containment would then be filled with SSCs

contaminated with relatively short-lived isotopes from the balance of the facility. Material would be placed in the building in a manner that would minimize the spread of any contamination (i.e., dry, contamination fixed, isolated). Engineered barriers would be put in place to deny access and eliminate the possibility of the release of any contamination to the environment. The reactor building or containment would be sealed and made weather tight.

The license termination monitoring program would be submitted and the site would be characterized. A partial site release would be completed for almost all of the site and the balance of the plant. The staff makes no assumptions as to when the license would be terminated and whether it would be terminated under the restricted or unrestricted provisions of 10 CFR Part 20, Subpart E. These decisions would likely be addressed as part of the staff's rulemaking effort related to entombment, explained above. The staff does assume that there would be a monitoring program period as long as 20 to 30 years to demonstrate that there was isolation of the contamination and adequate permanence of the structure.

The general activities that would occur during ENTOMB1 are listed below:

- planning and preparation activities
- draining (and potentially flushing) of contaminated systems and removal of resins from ion exchangers
- reduction of site-security area (optional)
- deactivation of support systems
- decontamination of radioactive components, including use of chemical decontamination techniques
- removal of the reactor vessel and internals
- removal of other large components, including major radioactive components

- removal of fuel from the spent fuel pool to an ISFSI
- dismantlement of remaining radioactively contaminated structures and placement of the dismantled structures in the reactor building
- installation of engineered barriers and other controls to prevent inadvertent intrusion and dispersion of contamination outside of the entombed structure
- filling of the void spaces in the previous reactor building structure with grout (concrete).

ENTOMB2 is also envisioned by the staff to begin the decommissioning process in a manner similar to the DECON option. The reactor would be defueled and the fuel initially placed into the spent fuel pool for some period prior to disposal at a licensed HLW repository or placed in an onsite ISFSI. Any decommissioning activity would be preceded by an accurate radiological characterization of SSCs throughout the facility. Active decommissioning would begin with the draining and decontamination of SSCs throughout the facility with the goal of isolating and fixing contamination. The spent fuel pool would be drained and decontaminated. SSCs would either be decontaminated or removed and either shipped to a LLW burial site or placed inside the reactor containment building (PWR) or the reactor building (BWR). Disposal offsite of resins would occur. The primary system would be drained, the RPV filled with contaminated material, all penetrations sealed, the RPV head reinstalled, and the reactor vessel filled with low-density concrete. Reactor internals would remain in place. Emphasis would be placed on draining and drying all systems and components and fixing contamination to prevent movement, either by air or liquid means. The steam generators and pressurizer would be laid up dry and remain in place. The reactor building or containment would then be filled with contaminated SSCs from the balance of the facility. Material would be placed in the building in a manner that would minimize the spread of any contamination (i.e., dry, contamination fixed, isolated).

Engineered barriers would be put in place to deny access and eliminate the possibility of the release of any contamination to the environment. The ceiling of the containment or reactor building, in the case of BWRs, may be lowered to near the refueling floor and to the top of the pressurizer for PWRs. The cavity of the remaining structure would be filled with a low-density concrete. The resulting structure would be sealed and made weather tight and covered with an engineered cap designed to deny access, and prevent the intrusion of water or the release of radioactive contamination to the environment.

The license termination monitoring program would be submitted and the site would be characterized. A partial site release would be completed for almost all of the site and the balance of the plant. The license would be likely terminated under the restricted release

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provisions of 10 CFR Part 20, Subpart E, after a site-monitoring program that demonstrates the isolation of the contamination and the permanence of the structure. Monitoring could be as long as 100 years.

The general activities that would occur during ENTOMB2 are listed below:

- planning and preparation activities
- draining (and potentially flushing) of contaminated systems and removal of resins from ion exchangers
- deactivation of support systems
- removal of fuel from the spent fuel pool to an ISFSI
- dismantlement of all radioactively contaminated structures (other than the reactor building) and placement of the dismantled structures in the reactor building
- I • potentially lowering of the ceiling of the reactor building to near the refueling floor (in BWRs) or near the top of the pressurizer (in PWRs)
- installation of engineered barriers and other controls to prevent inadvertent intrusion and dispersion of contamination outside of the entombed structure
- I • filling of the cavity of the reactor building structure with low-density concrete
- placement of an engineered cap over the entombed structure to further isolate the structure from the environment.

The advantages of both ENTOMB options are reduced public exposure to radiation due to significantly less transportation of radioactive waste to an LLW disposal site and corresponding reduced cost of LLW disposal. An additional advantage of ENTOMB2 is related to the significant reduction in the amount of work activity, and thus a significant reduction in occupational exposures, as compared to the DECON or SAFSTOR decommissioning options.

3.3 Summary of Plants That Have Permanently Ceased Operations

Twenty-two of the commercial nuclear reactors licensed by the NRC have permanently shut down and have had their licenses terminated or are currently being decommissioned. This section presents the significant characteristics of these plants, the decommissioning options being used by each plant, and each plant's decommissioning activities.

3.3.1 Plant Sites

An overview of the shutdown plants can be found in Table 3-1, which includes 22 units shut down between 1963 and 1997. Table 3-2 summarizes important characteristics of the shutdown plants. The thermal power capabilities of the reactors ranged from 23 to 3411 MW(t). The reactors operated from just a few days (Shoreham) to 33 years (Big Rock Point). Since 1987, an average of one plant per year has been shut down.

Three of the 22 plants (Fort St. Vrain, Shoreham, and Pathfinder) have completed decommissioning and have had their 10 CFR Part 50 licenses terminated. Two of these three (Fort St. Vrain and Shoreham) used the DECON process for decommissioning. One facility, Shoreham, operated less than three full power days before being shut down and decommissioned so there was relatively little contamination. Another facility, Pathfinder, was placed in SAFSTOR and subsequently decommissioned. Eleven of the plants shut down prematurely. Three Mile Island, Unit 2, ceased power operations as a result of a severe accident. Three Mile Island, Unit 2, has been placed in a monitored storage mode until Unit 1 permanently ceases operation, at which time both units are to be decommissioned.

Eleven of the permanently shutdown plants were part of the U.S. Atomic Energy Commission's (AEC's) Demonstrations Program, including Big Rock Point; Dresden, Unit 1; Fermi, Unit 1; GE-VBWR; Humboldt Bay, Unit 3; Indian Point, Unit 1; La Crosse; Pathfinder; Peach Bottom,

Unit 1; Yankee Rowe; and Saxton. These plants were prototype designs that were jointly funded by the AEC and commercial utilities. One of the plants, Pathfinder, has completed decommissioning and had its license terminated.

The most recent of the Demonstration Program reactors to shut down was Big Rock Point, which operated for 33 years and permanently shut down in 1997.

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Table 3-1. Summary of Shutdown Plant Information

| Types and Number of Shutdown Reactors | |
|--|----|
| BWR | 8 |
| PWR | 11 |
| HTGR | 2 |
| FBR | 1 |
| Decommissioning Option | |
| SAFSTOR | 14 |
| DECON | 7 |
| Accident cleanup followed by storage | 1 |
| Fuel Location | |
| Fuel onsite in pool | 13 |
| No fuel onsite ^(a) | 8 |
| Fuel onsite in ISFSI | 1 |
| Plan to move fuel to an ISFSI between 2000 and 2005 | 9 |
| (a) Includes Three Mile Island, Unit 2, which has approximately 900 kg of fuel remaining onsite due to the accident. | |

Eight of the decommissioned or decommissioning plants are located in the northeast (or mid-Atlantic states), six in the west, six in the midwest, and one in the east. The majority of the shutdown plants (13) are situated on freshwater or impoundments, five others are in coastal or estuarine environments, and three others are on the Great Lakes.

3.3.2 Description of Decommissioning Options Selected

Seven decommissioned units are located on multi-unit sites in which the remaining units continue to operate and one multi-unit site shut down both units permanently. All eight of these licensees chose SAFSTOR as the decommissioning option. In most cases, SAFSTOR was chosen so that all units on a site could be decommissioned simultaneously. For various reasons, however, most shutdown units have done some decontamination and dismantlement.

The reasons cited by licensees for choosing DECON have included the availability of LLW capacity, availability of staff familiar with the plant, available funding, the licensee's intent to use the land for other purposes, influence by State or local government to complete decommissioning, or a combination of other reasons.

A number of the plants have combined the DECON and SAFSTOR process by either entering shorter SAFSTOR periods or by doing an incremental DECON, allowing the plant to use resources and "decommission as they go." Sites have combined the options, usually to achieve

economic advantages. For example, one site decided to shorten the SAFSTOR period and begin incremental dismantlement out of concern over future availability of a waste site and future costs of disposal. One site that prematurely shut down had a short SAFSTOR period to allow short-lived radioactive materials to decay and to conduct more detailed planning. Safety is another reason for combining the two options. Because of seismic safety concerns, one site undertook a major dismantling project to remove a 76-m (250-ft) concrete vent stack after it had been in SAFSTOR for 10 years.

The licensee determines the physical condition of the site after the decommissioning process. Some licensees intend to restore the site to "greenfield" status at the end of decommissioning, while others may install a non-nuclear facility. The NRC's regulatory authority is only over that portion of the facility that is contaminated. Some licensees will leave structures standing at the time of license termination, and others will not. While undergoing the decommissioning process, some licensees have opted for partial site release to decrease the size of the site area.

3.3.3 Decommissioning Process

The processes of decommissioning a power reactor facility for the SAFSTOR and DECON options can be divided into four stages, as shown in Figure 3-3. Figure 3-4 identifies the comparable stages that could be postulated for the two ENTOMB options. The order of each step and the duration of each stage vary, depending on plant-specific characteristics, such as location, operating history, reactor vendor, and licensee. The staff considered the differences in timing and choice of activities in evaluating the environmental impacts of decommissioning based on the experiences of currently decommissioning facilities.

Stage 1 in Figures 3-3 and 3-4 includes the licensee's initial preparations to shut down the plant and begin decommissioning. This stage is primarily administrative. Stage 1 typically lasts 1½ to 2½ years, regardless of the decommissioning option chosen. The main activities during the planning and preparation stage are determining the decommissioning option, making changes to the organization structure (layoffs, hiring experienced decommissioning contractors, etc.), and initiating licensing-basis changes.

The planning and preparation activities of Stage 1 vary, depending on when the licensee decides to cease operation. If the end of service is planned, the licensee may make plans for the decommissioning process and may even submit the PSDAR in advance of shutdown. This allows the plant to start major decommissioning activities immediately following the certification of permanent shutdown and the removal of the fuel (see Chapter 2, "Background Information

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Related to Decommissioning Regulations,” for a discussion of major decommissioning activities). If the end of service is unplanned, the licensee will probably not be ready to start decommissioning activities immediately following the certification of permanent shutdown and removal of fuel. Therefore, the order and duration of the activities in Stage 1 might vary compared to a planned shutdown. For most plants, the organizational changes will include a reduction in the number of staff as well as implementation of an employee-retention program to encourage the needed staff to stay on. However, one site actually had to increase staffing levels at the time of the permanent cessation of operation to start the DECON process. Initial plant characterization will be made during the planning activities and will continue throughout the decommissioning process. Because these activities are mostly planning, administrative, and organizational in nature, there is little potential for onsite or offsite impacts from these activities and only small amounts of decommissioning-related LLW generated.

Stage 2 in Figures 3-3 and 3-4 involves the transition of the plant from reactor operation to decommissioning. Stage 2 will last from about ½ to 1½ years for plants in SAFSTOR, DECON, and ENTOMB. All plants will have to transfer fuel out of the reactor and into the spent fuel pool. Isolation and stabilization of all unnecessary SSCs are also conducted during this stage.

Licensing-basis changes will continue during this stage, and the licensee may request an exemption from offsite emergency preparedness requirements.

For DECON and SAFSTOR, there are a number of activities during Stage 2 that the plant can either choose not to perform or can perform at a later date. Chemical decontamination of the primary system and creation of a nuclear island are the two main activities that several decommissioning sites have undertaken. Chemical decontamination is optional for ENTOMB1 and would not likely occur for ENTOMB2. Support systems no longer necessary to reactor operation may also be removed for all four options. Likewise, additional support systems needed for decommissioning activities may be installed at this stage for DECON, SAFSTOR, and ENTOMB1. Changes to electrical systems are common during Stage 2.

Chemical decontamination of the primary system has been performed at several facilities, resulting in a reduction of total person-rem during decommissioning activities. One facility evaluated conducted a system decontamination, aiming at significant reduced dose to workers and reduced cost, by reducing both the amount and level of contamination from disposal of contaminated piping. This chemical decontamination was performed following the removal of the steam generators, pressurizer, and reactor coolant pump motors, as well as most of the

Table 3-2. Permanently Shutdown Plants

| Nuclear Plant | Reactor Type | Thermal Power | Shutdown Date ^(a) | Decommissioning Option ^(b) | Location | Fuel Status and License Termination Date |
|--|--------------|---------------|------------------------------|---------------------------------------|---------------|--|
| Plants Currently in Decommissioning Process | | | | | | |
| Big Rock Point | BWR | 240 MW | 08/30/97 | DECON | Michigan | Fuel in pool |
| Dresden, Unit 1 | BWR | 700 MW | 10/31/78 | SAFSTOR | Illinois | Fuel in ISFSI |
| Fermi, Unit 1 | FBR | 200 MW | 09/22/72 | SAFSTOR ^(c) | Michigan | No fuel onsite |
| GE-VBWR | BWR | 50 MW | 12/09/63 | SAFSTOR | California | No fuel onsite |
| Haddam Neck | PWR | 1825 MW | 07/22/96 | DECON | Connecticut | Fuel in pool |
| Humboldt Bay, Unit 3 | BWR | 200 MW | 07/02/76 | SAFSTOR ^(c) | California | Fuel in pool |
| Indian Point, Unit 1 | PWR | 615 MW | 10/31/74 | SAFSTOR | New York | Fuel in pool |
| La Crosse | BWR | 165 MW | 04/30/87 | SAFSTOR | Wisconsin | Fuel in pool |
| Maine Yankee | PWR | 2700 MW | 12/06/96 | DECON | Maine | Fuel in pool ^(d) |
| Millstone, Unit 1 | BWR | 2011 MW | 11/04/95 | SAFSTOR | Connecticut | Fuel in pool |
| Peach Bottom, Unit 1 | HTGR | 115 MW | 10/31/74 | SAFSTOR | Pennsylvania | No fuel onsite |
| Rancho Seco | PWR | 2772 MW | 06/07/89 | SAFSTOR ^(c) | California | Fuel in ISFSI/Partial DECON proposed in 1997 |
| San Onofre, Unit 1 | PWR | 1347 MW | 11/30/92 | SAFSTOR ^(c) | California | Fuel in pool |
| Saxton | PWR | 28 MW | 05/01/72 | SAFSTOR ^(c) | Pennsylvania | No fuel onsite/Currently in DECON |
| Three Mile Island, Unit 2 | PWR | 2772 MW | 03/28/79 | Accident cleanup followed by storage | Pennsylvania | Approx 900 kg fuel onsite/ Post-defueling monitored storage |
| Trojan | PWR | 3411 MW | 11/09/92 | DECON | Oregon | Fuel in pool |
| Yankee Rowe | PWR | 600 MW | 10/01/91 | DECON | Massachusetts | Fuel in pool ^(d) |
| Zion, Unit 1 | PWR | 3250 MW | 02/21/97 | SAFSTOR | Illinois | Fuel in pool |
| Zion, Unit 2 | PWR | 3250 MW | 09/19/96 | SAFSTOR | Illinois | Fuel in pool |
| Terminated Licenses | | | | | | |
| Fort St. Vrain | HTGR | 842 MW | 08/18/89 | DECON | Colorado | Fuel in ISFSI/License terminated in 1997 |
| Pathfinder | BWR | 190 MW | 09/16/67 | SAFSTOR | South Dakota | No fuel onsite/License terminated in 1992 |
| Shoreham | BWR | 2436 MW | 06/28/89 | DECON | New York | No fuel onsite/License terminated in 1995 |

(a) The shutdown date corresponds to the date of the last criticality.

(b) The option shown in the table for each plant is the option that has been officially provided to NRC. Plants in DECON may have had a short (1 to 4 yr) SAFSTOR period. Likewise, plants in SAFSTOR may have performed some DECON activities or may have transitioned from the storage phase into the decontamination and dismantlement phase of SAFSTOR.

(c) These plants have recently performed or are currently performing the decontamination and dismantlement phase of SAFSTOR.

(d) Licensee is in process of transferring fuel to dry storage in onsite ISFSI.

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auxiliary piping. At a second facility evaluated, a chemical decontamination was considered necessary to keep doses within previously issued EAs. The chemical decontamination was performed early in the decommissioning process to allow dismantling to proceed unimpeded. Other plants, both operating and permanently shutdown, have also performed chemical decontamination.

Some plants have also created nuclear islands, which reduce the scope of the required safeguards and security systems to only the fuel storage facilities and isolate the spent fuel so decontamination and dismantlement can proceed on the balance of the facility without the potential for affecting the spent fuel. Creating a nuclear island may involve installing an electrical power supply at the spent fuel pool, installing or modifying chemistry controls, designing and constructing a new heat removal system, and moving or installing new security-related equipment. For plants going into SAFSTOR, creation of a nuclear island is primarily a cost savings, but for plants in active decontamination and dismantlement, work activities may be done more conveniently when workers are not constrained by security requirements. ENTOMB2 would not benefit from the "nuclear island" concept.

Environmental impacts may vary at each site, depending on the activities and the timing of the activities performed. Examples of impacts include activities such as chemical decontamination, which result in the use of small quantities of water and produce LLW as well as some liquid effluents that would not be released unless they are below the limits allowed by the regulations in 10 CFR Part 20. Smaller amounts of waste will likely be generated during the creation of a nuclear island or the rewiring of a facility.

Stage 3 in Figure 3-3 involves decontamination and dismantlement of the plant for DECON, SAFSTOR, and ENTOMB1. For ENTOMB2, Stage 3 involves dismantlement of all radioactively contaminated SSCs external to the reactor building and placement of these SSCs in the reactor building, followed by lowering the ceiling to the D-rings (PWRs) or refueling floor (BWRs). For both ENTOMB options, it includes installation of concrete and engineered barriers and development of the license termination monitoring program. For those sites that have a SAFSTOR period, Stage 3 includes the storage time. The decontamination and dismantlement activities performed for SAFSTOR can occur before, after, or during the storage period. For the SAFSTOR period, Stage 3 can be from just a few years to about 54 years. For a site going straight through the DECON option, the time for Stage 3 would be expected to take between 3½ and 10 years. For either ENTOMB option Stage 3 would be expected to take 2 to 4 years.

The greatest variability in the decommissioning process is seen in Stage 3 and is related to dismantlement. Every plant that has completed decommissioning or has started dismantlement has performed the activities in different ways and at different times during the decommissioning

process. Two examples of large-component removal are at Rancho Seco and Trojan. Rancho Seco has started its dismantlement on the secondary side, removing the moisture separators, diesel generators, steam piping, and related components. Dismantlement of the equipment in the auxiliary building was also initiated. Plans for large-component removal are still in process. The primary issues related to decisions on large-component removal are how to transport the components. Because there are no convenient waterways for transport, the large components from Rancho Seco will have to be shipped by both road and rail, which will require segmentation or cutting up the larger components. Trojan took a different approach to dismantlement, based on the ability to ship by barge and the availability of disposal at Hanford. Trojan removed its four steam generators and pressurizer, pumped grout into them, and shipped them by barge for burial at Hanford. Following that activity, the reactor vessel and internals were removed whole, filled with grout, welded closed, and shipped. For Trojan, removing and shipping these large components as whole units saved millions of dollars and significantly reduced dose to workers.

Stage 4 of decommissioning is license termination. Activities for this stage, which are similar for all options, include final site characterization, final radiation survey submission of final license termination plan, and final site survey. The ENTOMB options would include both a partial site release and a site monitoring program.

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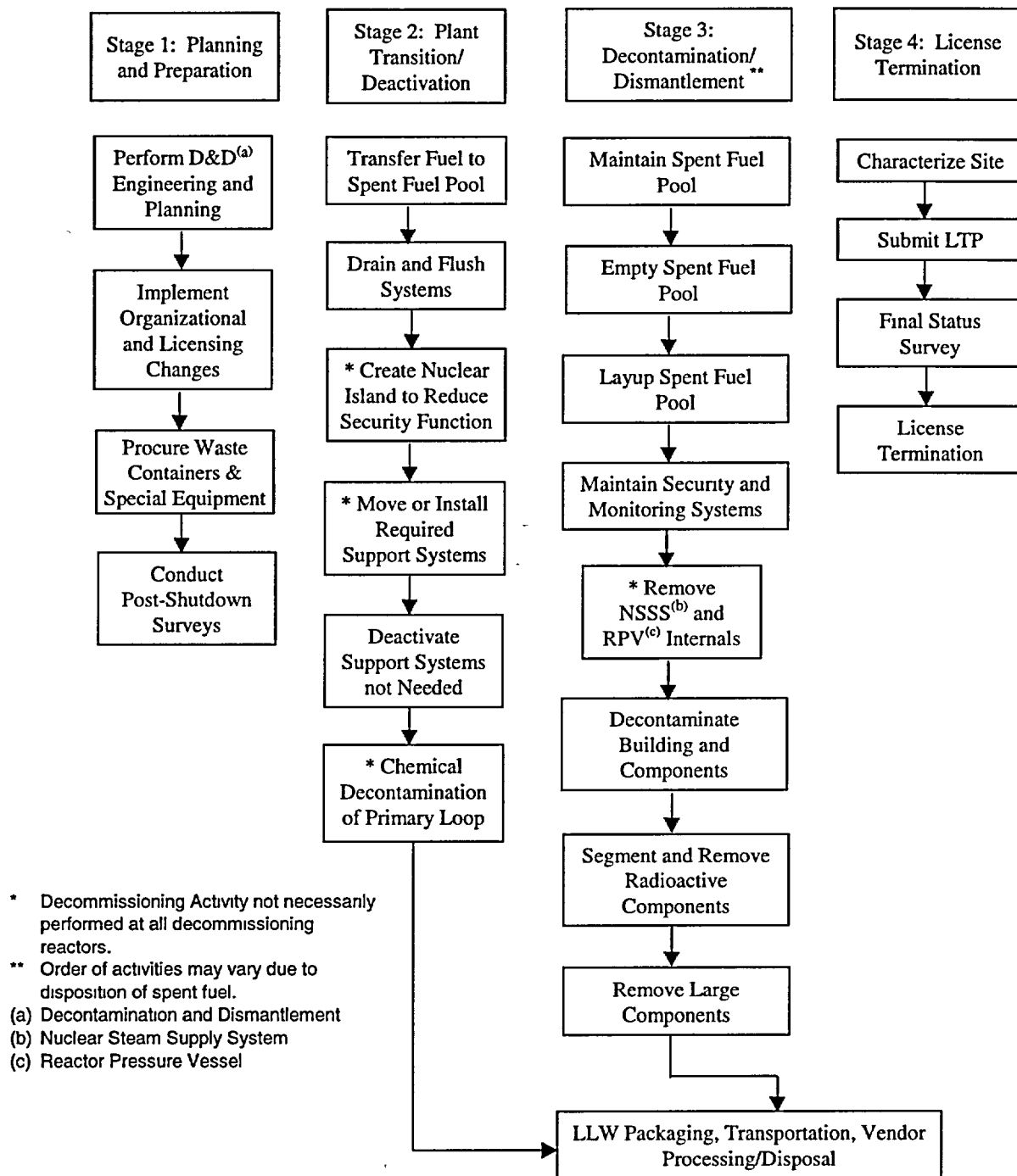


Figure 3-3. Reactor Decommissioning Process - DECON or SAFSTOR

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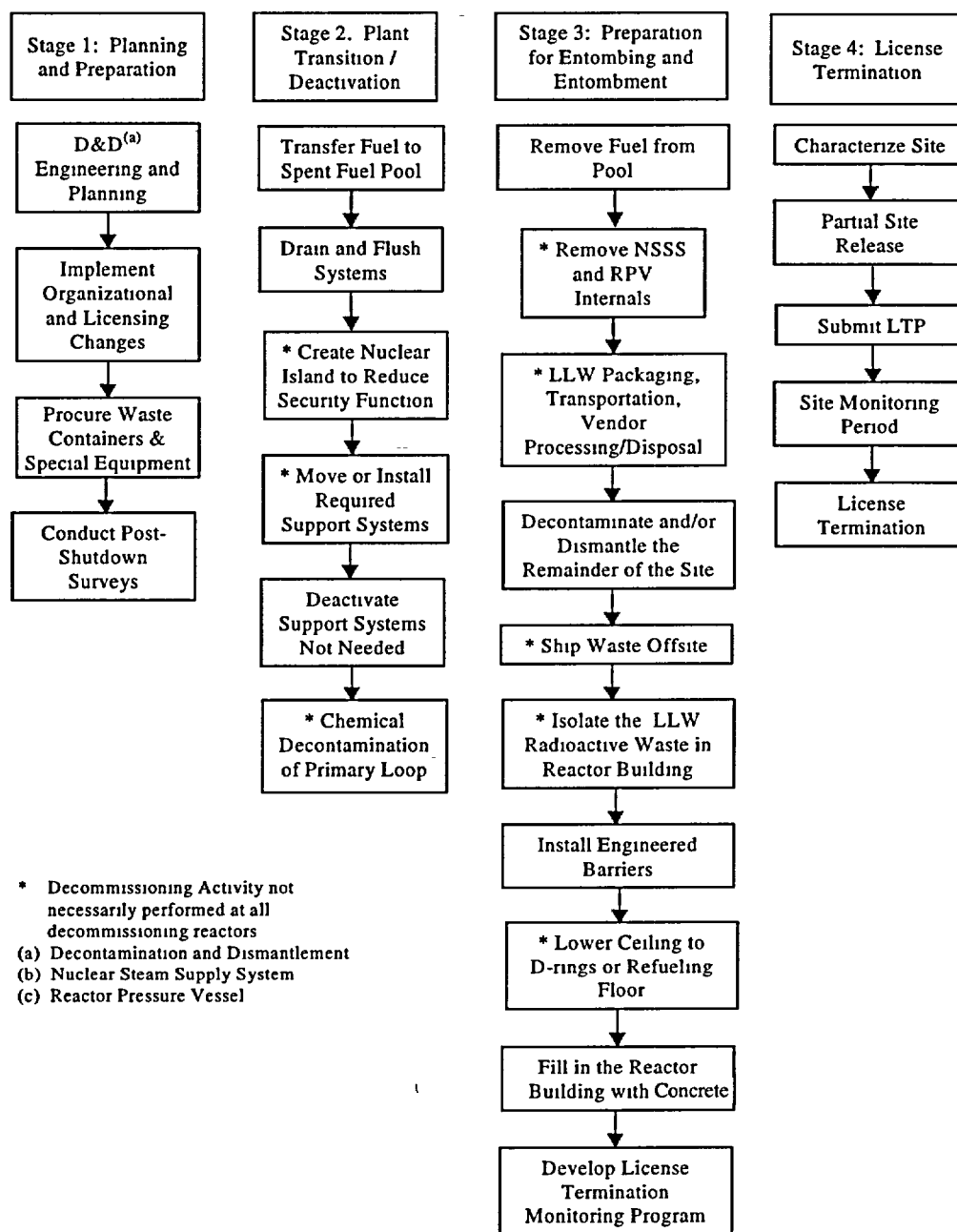


Figure 3-4. Reactor Decommissioning Process - ENTOMB

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3.4 References

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4.0 Environmental Impacts of Decommissioning Permanently Shutdown Nuclear Power Reactors

This section discusses the environmental impacts of decommissioning permanently shutdown nuclear power reactor facilities. Section 4.1 defines the terms used to describe environmental impacts of decommissioning activities. Section 4.2 briefly describes the process that was used to identify the environmental impacts of the decommissioning activities. The environmental impacts, including the staff's conclusions, are discussed in Section 4.3.

4.1 Definition of Environmental Impact Standards

This Supplement provides a measure of (1) the significance and severity of potential environmental impacts and (2) the applicability of these decommissioning impacts to a variety of facilities, both permanently shutdown and operating. The significance of each environmental impact is described as SMALL, MODERATE, or LARGE. The applicability of these impacts to a class of plants or site characteristics is categorized as either generic or site-specific. The following sections define the significance and applicability terms used in the Chapter 4 analyses.

4.1.1 Terms of Significance of Impacts

For decommissioning, the staff is using a standard of significance derived from the Council on Environmental Quality (CEQ) terminology for "significantly"^(a) (40 CFR 1508.27, which considers "context" and "intensity"). The NRC has defined three significance levels: SMALL, MODERATE, and LARGE.

SMALL – Environmental impacts are not detectable or are so minor that they will neither destabilize nor noticeably alter any important attribute of the resource. For the purposes of assessing radiological impacts in this Supplement, the NRC has concluded that those impacts that do not exceed permissible levels in the Commission's regulations are considered small.

(a) The National Environmental Policy Act of 1969 (NEPA) requires consideration of both *context* and *intensity* when determining the significance of an environmental impact. **Context** means that the significance of an action must be analyzed in several contexts, such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. **Intensity** refers to the severity of the impact and depends on many different factors, such as the unique characteristics of the site and the degree to which the proposed action affects public health or safety or may establish a precedent.

MODERATE – Environmental impacts are sufficient to alter noticeably, but not to destabilize, important attributes of the resource.

LARGE – Environmental impacts are clearly noticeable and are sufficient to destabilize important attributes of the resource.

I The discussion of each environmental issue in this Supplement includes an explanation of how
I the significance level was determined. In determining the significance level, the staff assumed
I that ongoing mitigation measures would continue (including those mitigation measures
I implemented during plant construction and/or operation) during decommissioning, as
I appropriate. Additionally, the staff has assumed that a licensee will obtain all relevant permits
I and appropriate consultations, will continue to comply with the conditions of those permits or
I consultations, and will use appropriate best management practices (BMPs) to minimize impacts
I of decommissioning activities. Benefits of additional mitigation measures during or after
I decommissioning are not considered in determining significance levels.

I The cumulative impacts of all activities were assessed. Cumulative impacts are incremental
I impacts of the decommissioning activity when added to other past, present, and reasonably
I foreseeable future actions at the licensed site.

I **4.1.2 Terms of Applicability of Impacts**

I In addition to determining the significance of environmental impacts, this Supplement includes a
I discussion of whether the analysis of the environmental issue could be applied to all plants and
I whether additional mitigation measures would be warranted. Each environmental issue is
I assigned to one of two categories:

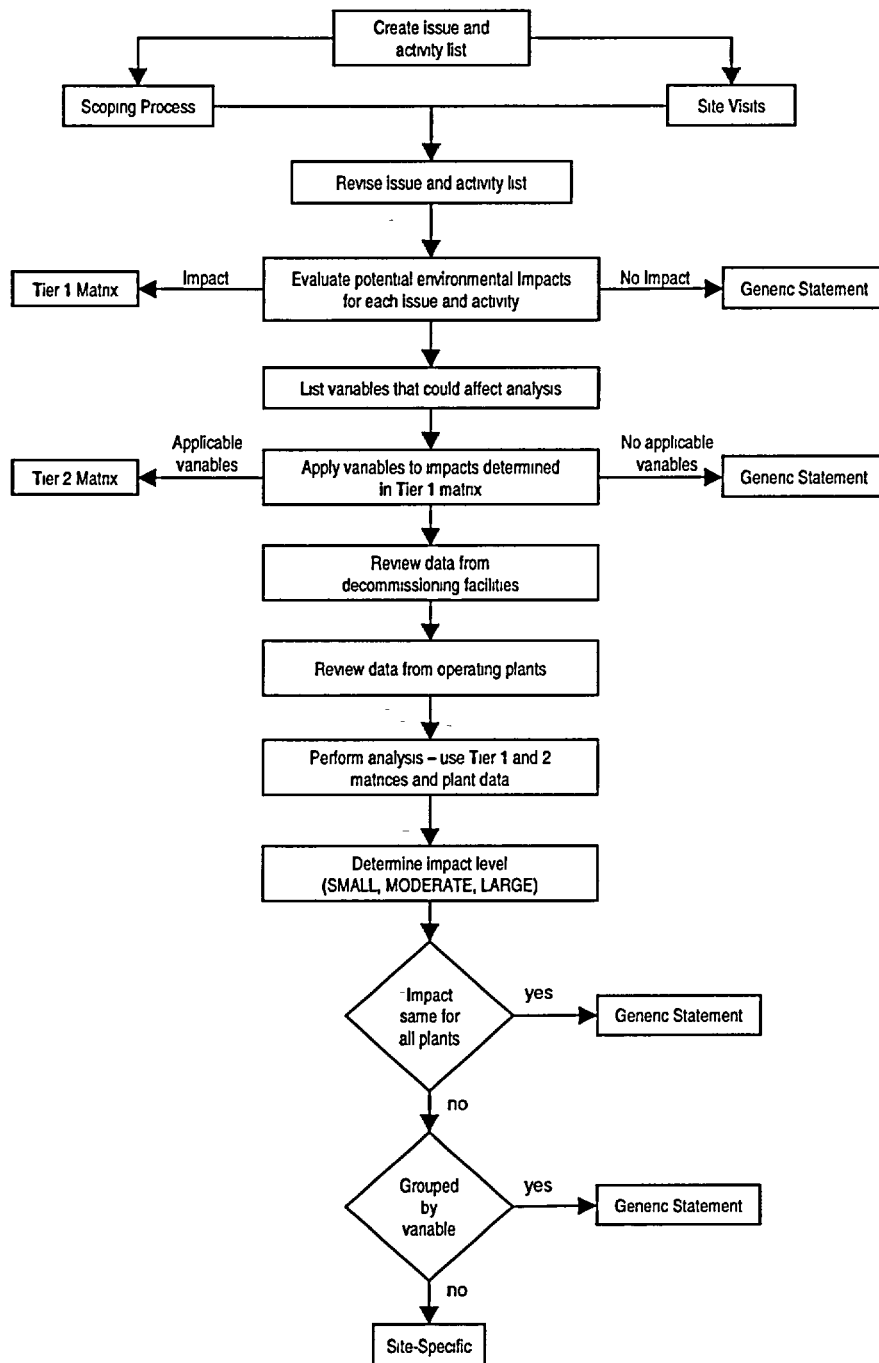
- I • Generic – For the issue, the analysis reported in this Supplement presents the following:
 - (a) Environmental impacts associated with the issue have been determined to apply either to all plants or, for some issues to plants of a specific size, a specific location, or having a specific type of cooling system or site characteristics, and
 - (b) A single significance level (i.e., SMALL, MODERATE, or LARGE) has been assigned to the impacts, and
 - (c) Mitigation of adverse impacts associated with the issue has been considered in the analysis, and it has been determined that additional plant-specific mitigation measures are likely not to be sufficiently beneficial to warrant implementation.

- Site-specific – For the issue, the analysis reported in this Supplement has shown that one or more of the generic criteria was not met. Therefore, additional plant-specific review is required. An example of a site-specific issue is threatened and endangered species.

For many issues, similar activities may be performed either on the plant site or offsite. In several cases, the conclusions as to generic or site-specific are different for these locations. In this Supplement, the term “operational areas” are the areas within the protected area fences, the intake and discharge structures, the cooling system, and other site structures, and the associated paved, graveled, and maintained landscaped areas. The operational area is defined as the portion of the plant site where most or all of the site activities occur, such as reactor operation, materials and equipment storage, parking, substation operation, facility service and maintenance, etc.

4.2 Evaluation Process

This section briefly describes the process that the staff used to determine the environmental impacts from decommissioning nuclear power facilities. For a detailed description of this process, see Appendix E, “Evaluation Process for Identifying the Environmental Impacts of Decommissioning Activities.” Figure 4-1 is a flowchart showing the evaluation process. Figure 4-1 identifies activities that occur during decommissioning and shows whether the activities affect any of the identified environmental issues. The environmental issues analyzed by the staff are the following: onsite/offsite land use, water use, water quality, air quality, aquatic ecology, terrestrial ecology, threatened and endangered species, radiological, radiological accidents, occupational issues, cost, socioeconomics, environmental justice, cultural impacts, aesthetic issues, noise, transportation, and irretrievable resources. To analyze each issue, the staff used the data obtained from previous studies and environmental reviews, information obtained during site visits and provided by the plants undergoing decommissioning, and information from currently operating nuclear power facilities. The staff’s assessment includes an assessment of cumulative impacts. For discussions of cumulative impacts, the NRC used the terminology defined in 40 CFR 1508.7. “Cumulative impact is the impact on the environment, which results from the incremental impact of the action (in the case of this Supplement, that is decommissioning activities) when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.” The staff examined the cumulative impacts of decommissioning activities and other past, present, and reasonably foreseeable future activities at the licensed sites.

**Figure 4-1. Environmental Impact Evaluation Process**

Previous or anticipated decommissioning activities at the fast breeder reactor (FBR) or high-temperature gas-cooled reactor (HTGR) have not and are not expected to result in impacts that are different from those found at other nuclear reactor facilities.

After analyzing each issue, the staff determined the nature of the impact (site-specific or generic) and the significance level of the environmental impact (SMALL, MODERATE, or LARGE). This evaluation resulted in a range of impacts for each issue that may be used for comparison by licensees that are or will be decommissioning their facilities.

4.3 Environmental Impacts from Nuclear Power Facility Decommissioning

The following sections are organized by issue and discuss environmental impacts. Each section has four parts:

- (1) Regulations – Identifies statutes, regulations, or limits relevant to the issue.
- (2) Potential impacts from decommissioning activities - Discusses possible impacts related to the issue and defines, where appropriate, the terms detectable and destabilizing for the issue.
- (3) Evaluation – Describes analysis and professional judgement used to estimate whether an activity or group of activities is likely to make a noticeable impact on the environment, considering the available data. If an impact is likely, existing and additional mitigation measures that can be taken to avoid the impact are evaluated. If an impact cannot be avoided, a determination is made as to whether the impact is likely to destabilize the resource.
- (4) Conclusion – Provides the staff's conclusion on significance (SMALL, MODERATE, LARGE) and applicability (generic or site-specific) of impacts to the issue.

The conclusions from this chapter are summarized in two tables in Appendix H. Table H-1 provides a list of decommissioning activities that have been determined to have no environmental impacts. These activities can be performed by licensees without further analysis. Table H-2 provides a comprehensive summary of the decommissioning activities and associated environmental issues that have been determined by the staff to have potential environmental impacts. Providing they fall within the range of the impacts identified, these activities can be performed with no further analysis by the licensee.

4.3.1 Onsite/Offsite Land Use

Nuclear power facilities are large physical entities, of which 20 to 40 ha (50 to 100 ac) may actually be disturbed during plant construction. Other land commitments can amount to many thousands of hectares for transmission line rights-of-way (ROWs) and cooling lakes. Farming and other types of agricultural land use occur on some nuclear reactor facility sites. Some utilities have designated portions of their sites for land uses such as recreation, management of natural areas, and wildlife conservation.

4.3.1.1 Regulations

Nuclear power facilities that began initial operation after the promulgation of the National Environmental Policy Act of 1969 (NEPA; 42 USC 4321 to 4347) or the Endangered Species Act of 1973 (ESA; 16 USC 1531 to 1544) were sited and are operated in compliance with these statutes. Any modifications to the facilities after the effective dates of these acts and others (see Appendix L-2) must be in compliance with the requirements of these statutes. The ESA applies to both terrestrial and aquatic biota. The individual States may also have requirements regarding threatened and endangered species; the State-listed species may vary from those on the Federal lists. In addition, activities such as decommissioning must take into account and avoid disturbance of historic and archeological sites, and American Indian grave sites. (Native American Graves Protection and Repatriation Act of 1990; 25 USC 3001 et seq.)

4.3.1.2 Potential Impacts of Decommissioning Activities on Land Use

Temporary changes in onsite land use could occur at a nuclear reactor facility site during decommissioning. Temporary changes may include addition or expansion of staging and laydown areas or construction of temporary buildings and parking areas. These temporary changes in onsite land use do not change the fundamental purpose or use of the reactor site. The major activities that may influence onsite land use are removal of large components, such as the reactor vessel and steam generators, structure dismantlement, and low-level waste (LLW) packaging and storage. Table E-3 in Appendix E describes the activities that occur during decommissioning that influence offsite and onsite land use.

The need for land during decommissioning is affected by the site layout. Most sites have sufficient area existing within the previously disturbed area (whether during construction or operation of the site) and, therefore, no additional land needs to be disturbed. The major activities projected to occur for decommissioning that are expected to temporarily require land include activities such as staging of equipment and removal of large components. In addition, the large number of temporary workers needed to accomplish the major decommissioning

activities may require that temporary facilities be installed for onsite parking, training, site security access, office space, change areas, fabrication shops, mockups, and related needs. |

Some activities, such as widening and rebuilding access roads or creating or expanding gravel pits for building roads, may occur offsite. The experience of plants that are being decommissioned has not included any needs for additional land offsite. |

Changes to land use are considered detectable if changes in the area's general land-use pattern result. The change would be destabilizing if large-scale new development and major changes in the land-use pattern occur. For example, a new local access route through rural land to the plant would represent a detectable, but not destabilizing, change in many localities. |

4.3.1.3 Evaluation

Nuclear power facility site areas range from 34 ha (84 ac) for the San Onofre Nuclear Generating Station in California to 9,700 ha (24,000 ac) for the Turkey Point Plant in Florida. According to NUREG-1437, *Generic Environmental Impact Statement for License Renewal of Nuclear Plants* (NRC 1996), of the operating reactors, 29 site areas range from 200 to 400 ha (500 to 1000 ac), with an additional 13 sites ranging from 400 to 800 ha (1000 to 2000 ac). Thus, almost 60 percent of the plant sites encompass 200 to 800 ha (500 to 2000 ac). Larger land-use areas are associated with plant cooling systems that include reservoirs, artificial lakes, and buffer areas. |

The nuclear reactor facilities being decommissioned are predominantly on the smaller sites, primarily because the older, smaller reactors have already permanently ceased operation. Only 6 out of 21 sites (29 percent) were between 400 and 800 ha (100 to 2000 ac); 6 (29 percent) were larger than 800 ha (2000 ac); and the rest (43 percent) were smaller than 400 ha (1000 ac) (see also Appendix F). |

Almost all of the sites undergoing active decommissioning are utilizing areas used during construction. Land requirements for decommissioning activities appear to be well within the range of land requirements for activities during major outages that occur in the course of normal operations. There does not appear to be any significant differences in land use between plants using SAFSTOR or DECON options. There is no experience with either ENTOMB option with commercial power reactors in the United States, although there is some entombment experience with former U.S. Department of Energy (DOE) scientific and nuclear materials production reactors. Because of the potential need for large amounts of concrete and aggregate for ENTOMB2, it is possible that a concrete batch plant might be set up onsite. There might not be adequate room within the operational area at some of the sites for such a |

facility, but it is likely that the impact of such a disturbance would be temporary and minor. Smaller amounts of concrete and aggregate would likely be required for the ENTOMB1 option.

Many of the facilities currently being decommissioned are relatively small reactors and located on small areas of land. However, a comparison of the land-use needs shows that many activities require the same amount of land for reactors whether the reactor size is small or large. It does not appear that land use will be significantly greater for future decommissioning at remaining sites. Previous or anticipated decommissioning activities at the FBR or HTGR have not and are not expected to result in onsite or offsite land-use impacts that are different from those found at other nuclear reactor facilities. There has been limited experience with multi-unit sites. Multiple-plant sites that are being decommissioned may be able to economize on space by reusing laydown areas.

Large-component removal is similar in its land requirements to major component replacement activities, such as steam generator replacement and refurbishment activities. Based on previous experience with steam generator replacement at a pressurized water reactor (PWR), it was estimated in NUREG-1437 that ~1 to 4 ha (~2.5 to 10 ac) of land may be needed to accommodate laydown, staging, handling, temporary storage, personnel processing, mockup and training, and related needs (NRC 1996). The impacts of steam generator or other major component removal during decommissioning should be similar or less. Generally, this land has been previously disturbed during the construction of the facility. Once the major decommissioning activities are completed, this land could be returned to its previous uses.

Based on current information collected at sites using the DECON and SAFSTOR options, decommissioning activities that affect offsite land use are not expected unless major upgrades to transportation links are required. It may be necessary to establish or re-establish road, rail, or water transportation links into the site for the purpose of bringing in equipment (especially large equipment), removing large components, and shipping offsite certain chemicals, waste concrete and metal, or other materials created, contaminated, or used in the decontamination and dismantlement processes. In such cases, offsite land-use impacts may be detectable or destabilizing. Additional attention to transportation routing and to the organization of activities to minimize the need for transportation re-establishment or upgrade may be able to reduce the impacts to undetectable levels. The ENTOMB options may require additional land offsite for a concrete batch plant, but in most cases the land use for this activity will be temporary, though detectable.

4.3.1.4 Conclusions

The staff has considered available information on the potential impacts of decommissioning on land use, including comments received on the draft of Supplement 1 of NUREG-0586. For

facilities having only onsite land-use changes as a result of large component removal, structure dismantlement, and LLW packaging and storage, the impacts on land use are not detectable or destabilizing. Therefore, the staff makes a generic conclusion that the potential impacts to land use onsite are SMALL. The staff has considered mitigation and concludes that no additional measures are likely to be sufficiently beneficial to be warranted. |

If changes in land use beyond the site boundary are anticipated, the impacts may or may not be detectable or destabilizing, depending on the site-specific conditions, and cannot be predicted generically. Therefore, the staff has concluded that if new land uses beyond the site boundary are anticipated, the magnitude of the potential impact may be SMALL, MODERATE, or LARGE, depending on the nature, size, and permanence of the disturbance to existing land use and must be determined through a site-specific analysis. |

4.3.2 Water Use

Nuclear reactor facilities are usually located near or adjacent to significant water bodies (aquifers, rivers, lakes, etc.) that are important to the region. Operating nuclear reactor facilities use water from multiple sources. For example, water from an adjacent lake might provide cooling water, whereas potable water may come from groundwater wells located onsite. Reactor cooling is the greatest use of water at an operating reactor. Other uses include waste treatment, potable water, process water, and site maintenance. |

4.3.2.1 Regulations

Water use at nuclear reactor facilities is regulated by State- and locally-issued permits. Most States require permits for surface water or groundwater withdrawals. |

4.3.2.2 Potential Impacts of Decommissioning Activities on Water Use

Cessation of plant operations will result in a significant decrease in water consumption because reactor cooling is no longer required. Although water will still be required for spent fuel cooling, this demand will decrease as the fuel ages. Dewatering systems may remain active during decommissioning of a nuclear facility to control the water pathway for the release of radioactive material. Table E-3 in Appendix E lists decommissioning activities that may influence water use. These activities include fuel removal, staffing changes, large component removal, decontamination and dismantlement (using high-pressure water sprays), structure dismantlement, and entombment. |

Impacts to water resources of decommissioning activities would be considered detectable if such activities result in a significant change in water supply reliability. The reliability of water supplies is impacted by a variety of factors, such as natural climatic variability and the reliability of the regional and local water-supply infrastructures. For example, an additional incremental drawdown attributable to a groundwater well at a decommissioning site may be measurable at an offsite well. However, this does not necessarily constitute a detectable change in the reliability of the water supply. It would be detectable if the offsite well is unable to withdraw its permitted volumes as a result of this increased drawdown. The impacts of decommissioning activities are considered destabilizing if they result in a permanent and/or significant loss of water supply reliability. For instance, heavy pumping of an aquifer that results in subsidence may cause a permanent loss of aquifer capacity. Another example of a destabilizing impact is a change in site drainage or stream-channel changes that would result in a detectable and significant change in the probability of flooding.

4.3.2.3 Evaluation

In general, the impact of nuclear reactor facilities on water resources dramatically decreases after plants cease operation. The flow through the condenser of an operating plant can range from 3 to 78 m³/s (49,000 to 1,200,000 gpm) (NRC 1996), depending upon the size of plant. This operational demand for cooling and makeup water is largely eliminated after the facility permanently ceases operation. As the plant staff decreases, the demand for potable water also generally decreases. However, in a few cases staffing levels have temporarily increased above levels that were common for routine operations. For these short periods of time, commonly during the early stages of decontamination and dismantlement activities, there may be a slight increase in demand for potable water.

Most of the impacts to water resources likely to occur during decommissioning of a nuclear facility are also typical of the impacts that would occur during decommissioning or construction of any large industrial facility. For example, providing water for dust abatement is a concern for any large construction project, as is potable water usage. However, the quantities of water required are trivial compared to the quantity used during operations. There are some activities affecting water resources and decommissioning nuclear facilities that are different from other industrial non-nuclear activities. The demand for water for spent fuel maintenance (approximately 200 to 2000 L [50 to 500 gal.] of water per day, depending on the size and location of the pool) and wet decontamination methods (such as a full flush of the primary system or hydrolasing embedded piping in place), although not large, are unique to nuclear facilities. One facility reported using approximately 9500 to 11,000 L (2500 to 3000 gal.) of water per day for spent fuel pool spray-cooling during the summer months. Additionally, water in some of the systems or piping may continue to be used during decontamination and dismantlement to

provide shielding from radiation for workers who are dismantling structures, systems, and components (SSCs) in the vicinity. For example, 912,000 L (240,000 gal.) of water was used at one site to fill the reactor cavity in preparation for the segmentation of the reactor vessel. |

Common engineering practices, such as water reuse, are used to limit water use impacts at most construction or industrial sites. However, use of some of these practices may be limited by radiological exposure considerations at decommissioning sites. |

Water use at decommissioning nuclear reactor facilities is significantly smaller than water use during operation. The water use will be greater in facilities that are undergoing decontamination and dismantlement than those that are in the storage phase. During ENTOMB, water will be required as the concrete for entombment is mixed. Greater amounts of water will be needed for the ENTOMB2 option than for ENTOMB1. However, in both cases, this process would be of short duration and would not consume quantities of water in excess of those used in the construction of large buildings. |

Previous or anticipated decommissioning activities at the FBR or HTGR have not and are not expected to result in water use impact that is different from those found at other nuclear reactor facilities. |

4.3.2.4 Conclusions

The staff considered available information on the potential impacts of decommissioning on water use, including information received on the draft of Supplement 1 of NUREG-0586. This information indicates that the impacts of decommissioning on water use are neither detectable nor destabilizing. Therefore, the staff makes a generic conclusion that the potential impacts to water use are SMALL. The staff has considered mitigation and concludes that no additional measures are likely to be sufficiently beneficial to be warranted. |

4.3.3 Water Quality

There are quality standards for drinking water, protection of aquatic and terrestrial habitats, and release of potential pollutants to surface and groundwater environs. Nuclear reactor facilities are usually located above aquifers or adjacent to important sources of water. Intended and accidental releases of potential pollutants may impact the quality of these waters. This section considers water quality impacts of nonradioactive material for both surface water and groundwater during the decommissioning process. Impacts from releases of radioactive material in liquid effluents are discussed in Section 4.3.8, "Radiological." |

4.3.3.1 Regulations

I Intentional releases of nonradioactive discharges to surface waters are regulated through the
I National Pollutant Discharge Elimination System (NPDES; Section 402 of the Federal Water
I Pollution Control Act, commonly referred to as the Clean Water Act [CWA] [33 USC 1251 to
I 1387]) to protect water quality. Congress has delegated the responsibility for NPDES
I implementation to the U.S. Environmental Protection Agency (EPA). When the EPA
I determines that State programs are equivalent to the Federal NPDES program, the NPDES
I permitting process is delegated to the State. Generally, discharge limits specified by the
I NPDES permit are revisited every 5 years. Ongoing monitoring programs may be required as
I part of an NPDES permit.

I The Resource Conservation and Recovery Act of 1976 (RCRA; 42 USC 6901 et seq.)
I addresses the need to investigate and clean up contamination in the event of the release of
I nonradioactive hazardous material not covered within the limits of the NPDES permit. As with
I the NPDES permitting process, Congress has delegated the responsibility for RCRA implemen-
I tation to the EPA. Because NPDES permits regulate only intentional discharges to surface
I water, any accidental releases of nonradioactive hazardous materials that may impair water
I quality (surface water or groundwater) are regulated through the RCRA process. RCRA
I requires responsible parties to clean up environmental contaminants regardless of the time of
I their release. The degree of investigation and subsequent corrective action necessary to
I protect human health and the environment vary significantly among facilities. When the EPA
I determines that State programs are equivalent to the Federal RCRA program, the corrective
I action program is delegated to the State.

I Based on an October 1978 decision by the Atomic Safety and Licensing Board, (TVA 1978a,
I TVA 1978b), NRC authority does not extend to matters within the jurisdiction of the EPA. More
I specifically, the NRC authority is limited for those matters expressly assigned to the EPA by the
I Federal Water Pollution Control Act Amendments of 1972. This decision would also apply to
I decommissioning nuclear reactor facilities.

4.3.3.2 Potential Impacts of Decommissioning Activities on Water Quality

I Table E-3 in Appendix E shows the activities during decommissioning that may affect water
I quality. These major activities include fuel removal, stabilization, decontamination and
I dismantlement, and structure dismantlement. Separate assessments of potential impacts were
I performed for surface water and groundwater. Surface waters are most likely to be impacted
I either by stormwater runoff or by releases of substances during decommissioning activities.

Because water quality and water supply are interdependent, changes in water quality must be considered simultaneously with changes in water supply. For example, reduced groundwater pumping may result in a rise in the water table, providing a new pathway for contaminants currently in the subsurface. Changes in the landscape (terrain and vegetation) during decommissioning can alter the hydrologic pattern of recharge and surface-water runoff. The convergence of surface water over unvegetated soils may result in accelerated erosion and the delivery of sediment to important downstream habitat.

Impacts to water quality of decommissioning activities would be considered detectable if such activities result in a significant change in water-supply reliability. For example, stormwater erosion at a facility undergoing decommissioning may result in a measurable increase in suspended sediment in an adjacent stream or disposal of concrete onsite could alter local water chemistry of the groundwater. However, this does not constitute a detectable change in the reliability of the water supply unless the incremental change in sediment concentration precludes permitted or environmental uses. The impacts of decommissioning activities would be considered to be destabilizing on water quality if they result in a permanent or significant loss of water-supply reliability. For instance, significant increases in erosion might result in a permanent loss of benthic habitat for certain fish species.

4.3.3.3 Evaluation

Both the decommissioning activities themselves and the order in which the activities are performed control the impacts to water quality. The same activities performed in a different order can have a significantly different impact on water quality. The time between activities may also be important in assessing impacts. Delaying activities during SAFSTOR may exacerbate water-quality issues. For example, the aging of structures may create new pathways for groundwater to enter contaminated subgrade structures. This would be less of an issue for entombment of a facility, where the plant's contaminated SSCs are encased in concrete and maintained as a solid structure isolated from the environment.

Stormwater runoff and erosion control are issues faced at many industrial sites, and it is expected that after application of common BMPs, any changes in surface-water quality will be nondetectable and nondestabilizing.

All commercial nuclear power facilities have NPDES permits that regulate intentional releases of hazardous materials. Historically, unintentional releases of hazardous substances have been an infrequent occurrence at decommissioning facilities. Because the focus of decommissioning is the ultimate cleanup of the facility, considerable attention is placed on minimizing spills. Except for a few substances such as hydrocarbons (diesel fuel), such hazardous spills are

I localized, quickly detected, and relatively easy to remediate. Relevant regulations are listed in
I Appendix L. Some of the groundwater parameters measured in the license termination plan
I (LTP) might also be indicators of a heretofore undetected nonradiological subsurface plume. If
such indications were observed, further characterization and corrective actions would be
dictated by the relevant regulations discussed in Appendix L and permits, if appropriate.

Certain decommissioning activities or options may result in changes in local water chemistry.
I For example, if licensees dismantle structures by demolition and disposal of the concrete rubble
I on the site, then there is a potential that the hydration of concrete could cause an increase in
I alkalinity of groundwater. The pH of interstitial (pore) water very close to the concrete rubble
I would remain above 10.5 for several hundred thousand years (Krupa and Serne 1988).
I However, as the leachate migrates away from the demolition debris, it is reasonable to expect
I the leachate pH to be rapidly reduced (within meters) to natural conditions due to the large
I buffering capacity of soils. While the leachate's pH may not be a water-quality concern, such
I leachate may affect the transport properties of radioactive and nonradioactive chemicals
I (notably metals) in the subsurface although this transport would not be detectable offsite.
I Surface spreading of the demolition debris over large areas may provide adequate opportunity
I for soils to buffer the pH to background. Because the nonradiological impacts would be
I nondetectable, they are considered to be generic for all sites. However, concentrated disposal
I of demolition debris, either within or outside of existing below-grade structures, would require
I below-grade compliance with RCRA guidelines. The radiological aspects of onsite disposal of
I slightly contaminated material would require a site-specific analysis and would be addressed at
the time the LTP is submitted.

Current or anticipated decommissioning activities at the FBR or HTGR have not and are not
I expected to result in water-quality impacts that are different from those found at other nuclear
I reactor facilities.

4.3.3.4 Conclusions

I The staff considered available information on the potential impacts of decommissioning on
I nonradioactive aspects of water quality for both surface water and groundwater, including
I comments received on the draft of Supplement 1 of NUREG-0586. This information indicates
I that for all facilities the impacts of decommissioning on water quality will be neither detectable
I nor destabilizing. Therefore, the staff makes a generic conclusion that for all facilities, the
I impacts on nonradioactive aspects of water quality are SMALL. The staff has considered
I mitigation and concludes that no additional measures are likely to be sufficiently beneficial to be
warranted.

4.3.4 Air Quality

Decommissioning activities have the potential to adversely impact air quality. The activities may be direct, such as demolition of buildings, or indirect, such as transportation of decommissioning workers to and from the site. This section discusses the nonradiological impacts of decommissioning on air quality. Radiological impacts on air quality are addressed in Section 4.3.8, "Radiological."

4.3.4.1 Regulations

The purpose of the Clean Air Act (CAA) as amended (42 USC 7401 et seq.) is to "protect and enhance the quality of the Nation's air resources so as to promote the public health and welfare and the productive capacity of its population." Section 118 of the CAA, as amended, requires that each Federal agency, such as NRC, with jurisdiction over any property or facility that might result in the discharge of air pollutants, comply with "all Federal, state, interstate, and local requirements" with regard to the control and abatement of air pollution. Pursuant to the Act, the EPA established National Ambient Air Quality Standards to protect public health, with an adequate margin of safety, from known or anticipated adverse effects of regulated pollutants (42 USC 7409). Hazardous air pollutants and radionuclides are regulated separately (42 USC 7412).

EPA's regulations are found in Title 40 of the Code of Federal Regulations. The National Primary and Secondary Ambient Air Quality Standards are found in 40 CFR Part 50. The standards related to particulate matter (40 CFR 51.06 and 40 CFR 51.07) are particularly relevant to decommissioning activities. Other regulations that may cover decommissioning activities are found in 40 CFR Part 61, which deals with hazardous air pollutants such as asbestos, chlorofluorocarbons, and radionuclides; 40 CFR Part 81, which deals with designation of areas for air-quality planning purposes; and 40 CFR Part 82, which deals with protection of stratospheric ozone.

In addition, State and local agencies have developed and enforce a variety of air-quality regulations. These regulations require permits for emission sources, limit emission rates, and set maximum atmospheric concentrations for pollutants. Finally, different regulations apply to indoor air quality and worker safety.

4.3.4.2 Potential Impacts of Decommissioning Activities on Air Quality

I Table E-3 in Appendix E shows activities that may have an effect on air quality. These include
I organizational changes, stabilization, storage preparation for SAFSTOR, decontamination and
I dismantlement, structural dismantlement, entombment, and transportation. The potentially
I adverse impacts identified include (1) degradation of air quality caused by emissions (e.g., NO_x,
I CO, and hydrocarbons) from internal combustion engines, (2) increased particle loading of the
I atmosphere caused by the movement of vehicles and equipment, demolition of structures,
I dismantlement of systems, and operation of concrete batch plants, and (3) alteration of other
I characteristics of the atmosphere (e.g., the ozone layer) by releases of gases used in plant
I systems (e.g., in fire suppression or refrigeration).

I Air-quality impacts of emissions from internal combustion engines and changes in atmospheric
I particle loading can be assessed by comparison with standards set in air-quality regulations.
I These potential impacts are considered detectable if a decommissioning activity is likely to
I cause a measurable increase in the concentration of one or more regulated air pollutants that
I can be directly attributed to the activity. The impact is considered to be destabilizing if the
I impact is detectable and causes a change in the attainment status of the region. Air-quality
I impacts of the releases of other gases can be assessed by comparison with the magnitude of
I potential releases during decommissioning with the magnitude of releases of the same or
I similar gases from other sources.

4.3.4.3 Evaluation

I Decommissioning activities that have the potential to have a nonradiological impact on air
I quality include:

- I • worker transportation to and from the site
- I • dismantling of systems and removing of equipment
- I • movement and open storage of material onsite
- I • demolition of buildings and structures
- I • shipment of material and debris to offsite locations, and
- I • operation of concrete batch plants.

These activities typically take place over a period of years from the time the facility ceases operation until the decommissioning is complete and the license is terminated. The magnitude and the timing of the potential impacts of each activity will vary from plant to plant, depending on the decommissioning options selected by the licensee and the status of facilities and structures at the time of license termination. |

Worker transportation: Air-quality impacts of transportation of workers to and from the site are caused by emissions from the vehicles and by fugitive dust from traffic on paved and unpaved roads. Consequently, the impacts can be estimated directly from the size of the work force. Experience with decommissioning indicates that for most sites the onsite work force tends to decrease from the time that plants cease operation until decommissioning is complete. There are occasional increases during specific decontamination and dismantlement activities. However, the work force during decommissioning is smaller than the construction work force and the work force during refueling outages, and almost always smaller than the work force during facility operation. |

Assuming that neither the mix of vehicles used for worker transportation nor the vehicle occupancy is different during decommissioning than during plant construction or operation, emissions from vehicles and fugitive dust associated with traffic is expected to decrease during the decommissioning period. These decreases are expected to improve air quality rather than degrade it. Consequently, the change in air quality associated with changes in worker transportation during decommissioning should not be detectable or destabilizing at any site. |

Dismantling systems and removing equipment: Air-quality impacts of dismantling systems and removing equipment may be caused by the generation and release of particulate matter associated with the physical activities of dismantling and by the release of gases from the systems (for example, refrigeration systems and fire-protection systems). |

The predominant potential effluent from system dismantling and removal of equipment will be particulate matter and fugitive dust. This material will generally be released in and remain within buildings and other structures because most decommissioning activities associated with dismantling systems and removing equipment will be conducted inside the containment, auxiliary, and fuel-handling buildings. These buildings have systems to minimize airborne contamination, such as whole-building air filtration. Filtration systems control the release of particulate matter to the environment. These systems, which are typically maintained and periodically operated during decommissioning, reduce the impact of airborne particulate material. Where filtration systems are not in place to control particulate releases, temporary systems can be established, as needed. Special air-ventilation pathways may be established before the start of a SAFSTOR period to ensure that air ventilates from the building through |

I high efficiency particulate air (HEPA) filters. It is unlikely that particulate matter released to the
 I environment as a result of system dismantlement and equipment removal will be sufficient to be
 I detectable offsite. Special precautions are required for worker protection where hazardous
 I materials such as asbestos may become airborne, as discussed in Section 4.3.10,
 I "Occupational Issues."

I Various systems associated with reactors contain gases that are of environmental concern. For
 I example, some gases used in refrigeration systems and fire-suppression systems have been
 I identified as ozone-depleting compounds. Venting of these gases to the atmosphere is pro-
 I hibited by law. Standard methods exist to purge systems with these gases and limit releases to
 I the environment to insignificant quantities. Other fire suppression and refrigeration systems
 I may contain greenhouse gases. The quantities of these gases at a nuclear plant are generally
 I small in comparison with the quantities of greenhouse gases released hourly by a fossil-fuel
 I combustion plant used for heating or power generation. The impacts of ozone-depleting and
 I greenhouse gases are global rather than local. Therefore, it is unlikely that releases of ozone-
 I depleting or greenhouse gases during decommissioning of any nuclear power plant will be
 I detectable or destabilize the environment.

I Movement and open storage of material onsite: Movement of equipment and open storage of
 I materials onsite during decommissioning are similar to activities during construction or
 I demolition of an industrial facility. The air-quality impacts of the movement of equipment and
 I open storage of materials onsite are primarily associated with fugitive dust. Movement of
 I equipment outside of the buildings may generate fugitive dust. Movement of equipment may
 I also alter the size distribution of particles on the ground, making the particles more susceptible
 I to suspension by the wind. Mitigation measures will be taken to minimize dust to comply with
 I local air-quality regulations. Common mitigation measures include watering and other soil
 I stabilization measures, such as spraying sealants on the area and seeding. Therefore, it is
 I unlikely that the movement of equipment and open storage of materials will be detectable or
 I destabilize regional air quality.

I Demolition of buildings and structures: Once decontamination has been completed, the
 I demolition of buildings and other structures at a nuclear power plant is similar to demolition of
 I buildings and structures at industrial facilities. Demolition of buildings and major structures may
 I cause a temporary increase in fugitive dust from the site. Fugitive dust from demolition of
 I buildings and structures will involve large particles that will settle to the ground quickly.
 I Demolition will generally be limited to a small number of short-duration events. Mitigation
 I measures will be used to minimize dust. Therefore, it is unlikely that the fugitive dust from
 I demolition of buildings and structures will be detectable or destabilize air quality.

If residual contamination is present at the time of demolition, then the demolition of buildings and structures must be conducted using techniques that keep releases of contaminated material within regulatory limits. For purposes of assessing radiological impacts, impacts are of small significance if doses and releases do not exceed limits established by the Commission's regulations. |

Shipment of material and debris to offsite locations: Dismantled equipment, material, and debris from decommissioning are typically removed from the site as decommissioning progresses. The number of shipments required during the decommissioning period depends on the method of transportation and the decommissioning option chosen. Although the number of shipments may be relatively large, the decommissioning period extends over several years. As a result, the number of shipments per day is small. Current experience is that there is an average of less than one shipment per day of LLW from the plant (see Section 4.3.17, "Transportation"). Therefore, it is unlikely that the emissions from a shipment or a small number of shipments per day would be detectable or destabilize local or regional air quality at any nuclear power plant undergoing decommissioning. |

Operation of a concrete batch plant: The ENTOMB options will require a large amount of concrete and aggregate. Unloading, movement, and dispensing of the materials that make concrete result in fugitive dust in the vicinity of concrete batch plants. Most of the dust is associated with unloading dry cement at the concrete batch plant and loading mixers or trucks. This dust tends to consist of large particles that settle out of the air quickly. As a result, dust associated with concrete batch plant operations is likely to be localized near the concrete batch plant. There will also be emissions from heavy equipment at concrete batch plants and vehicles used to transport concrete from the concrete batch plant to the entombment site. The likely impacts of these emissions will be smaller than those from dust. |

There are a number of mitigation measures that can be used to control dust. Dust control measures commonly used at concrete batch plants include enclosure of dumping and unloading areas and conveyors, use of filters, and use of water sprays. There would be no significant difference between a concrete batch plant used in the ENTOMB option and a batch plant used for any other major construction activity. Therefore, the staff considers it unlikely that the environmental impacts of operation of a concrete batch plant for a plant undergoing entombment would be detectable or destabilize air quality. |

In summary, the most likely impact of decommissioning on air quality is degradation of air quality by fugitive dust. Fugitive dust during decommissioning should be less than during plant construction because the size of the disturbed areas is smaller, the period of activity is shorter, and paved roadways may exist. Use of BMP, such as seeding and wetting, can be used to |

- I minimize fugitive dust. During demolition activities, some particulate matter in the form of fugitive dust may be released into the atmosphere, but much of this fugitive dust consists of large particles that settle quickly. To date, licensees decommissioning nuclear reactor facilities have taken appropriate and reasonable control measures to minimize fugitive dust. No anticipated new methods of conducting decommissioning and no peculiarities of operating plant sites are anticipated to affect this pattern.
- I The selection of the decommissioning option (DECON, SAFSTOR, ENTOMB1, or ENTOMB2)
- I is more likely to affect the timing of air-quality impacts than the magnitude of the impacts.
- I Immediate decontamination and dismantlement of the facility (DECON) results in impacts
- I earlier than the SAFSTOR option, in which most decommissioning activities are postponed to
- I permit residual activity in the plant to decay. ENTOMB1 and ENTOMB2 may include the
- I dismantlement of structures outside of containment and, thus, could result in air-quality impacts
- I related to fugitive dust that would be the same as or greater than during DECON.
- I Previous or anticipated decommissioning activities at the FBR or HTGR have not and are not
- I expected to result in air-quality impacts that are different from those found at other nuclear facilities.

4.3.4.4 Conclusions

- I The staff has considered available information on the potential impacts of decommissioning on
- I air quality, including comments received on the draft of Supplement 1 of NUREG-0586. This
- I information indicates that the impacts of decommissioning on air quality are neither detectable
- I nor destabilizing. Therefore, the staff makes the generic conclusion that the impacts on air
- I quality are SMALL. The staff has considered mitigation and concludes that current and
- I commonly used measures are sufficient and no additional measures are likely to be sufficiently
- I beneficial to be warranted.

4.3.5 Aquatic Ecology

- I Aquatic ecology issues incorporate all of the plants, animals, and species assemblages in the
- I rivers, streams, oceans, estuaries, or any other aquatic environments near a nuclear power
- I facility. Aquatic ecology also includes the interaction of those organisms with each other and
- I the environment.

4.3.5.1 Regulations

Federal laws that are included within a NEPA evaluation of aquatic ecology issues include the CWA, the ESA of 1973, the Fish and Wildlife Coordination Act (16 USC 661 to 667c), and NEPA. Although some biota may be affected by a number of decommissioning activities, full consideration is usually reserved for the more important aquatic resources, which may be either individual species or habitat-level resources. Some activities, such as removal of in-stream or shoreline structures, may require permits from other agencies.

4.3.5.2 Potential Impacts of Decommissioning Activities on Aquatic Ecological Resources

Table E-3 in Appendix E identifies decontamination and dismantlement and structural dismantlement as activities that may affect aquatic ecology. Aquatic ecological resources may be impacted during the decommissioning process via either the direct or the indirect disturbance of plant or animal communities near the plant site. Direct impacts can result from activities such as the removal of shoreline or in-water structures (i.e., the intake or discharge facilities), the active dredging of a stream, river, or ocean bottom, or the filling of a stream or bay while indirect impacts may result from effects such as runoff. During decommissioning, aquatic environs at the plant site may be disturbed for the construction of support facilities, such as to build a dock for barges or to bridge a stream or aquatic area. Additionally, aquatic environs away from the plant site may be disturbed to upgrade or install new transportation systems (e.g., a new rail line to support large component removal) or to install or modify transmission lines. In most cases, aquatic disturbances will result in relatively short-term impacts and the aquatic environs will either recover naturally or impacts can be mitigated. Minor impacts to aquatic resources could result from sediment runoff generation due to ground disturbance and surface erosion and runoff. Impacts may occur if shoreline or in-water structures, such as the intake or discharge facilities and pipes, are removed. These impacts will typically be temporary and will not be detectable nor will they destabilize important attributes of the resource. It is important that shoreline or in-water structure removal is managed in a manner that does not result in the establishment of nonindigenous or noxious plants and animals to the exclusion of native species.

If decommissioning does not include removal of shoreline or in-water structures, very little aquatic habitat is expected to be disturbed during decommissioning. Thus, practically all aquatic habitat that was used during regular plant operations or, at a minimum, was not previously disturbed during construction of the site will not be impacted. If all activities are confined to the plant operational areas, impacts are expected to be minor and would primarily result from increased sediment from physical alterations of the site. If no disturbances occur

beyond the regular operational areas of the site, it is expected that the impact to aquatic resources will be nondetectable, nondestabilizing, and easily mitigated.

In some cases, the aquatic habitats that were originally disturbed during the construction of the site will continue to be of low habitat quality at the time of site decommissioning, even beyond the normal operations boundaries. However, important resources could either develop on the site or colonize the area disturbed by the construction. If a decommissioning activity results in the "removal" of species from an area (e.g., if a commercial or recreational fishery is no longer possible), this may be detectable. Reworking the ground surface during construction could alter the surface-drainage patterns such that wetlands on the original construction site may no longer support an aquatic community. If this is an important local or regional resource, it may be considered destabilizing.

4.3.5.3 Evaluation

The primary factors that must be considered in evaluating the potential for adverse impacts in areas previously disturbed by construction include the quantity of habitat to be disturbed, the length of time since initial disturbance, and the successional patterns of the aquatic communities (especially nuisance species). Most of the important aquatic ecological resources are not likely to occur on most plant sites. If they do occur, the decommissioning activities can probably be planned to avoid or minimize detectable and destabilizing effects.

Two decommissioning activities may result in impacts to the aquatic environment: removal of structures from the shoreline or in-water environment and removal of contaminated soil from the site (the latter applies only if the soil is in or near an aquatic environment).

Additionally, dredging and modification of barge loading facilities may result in impacts to aquatic ecological resources. Periodic permitted, maintenance dredging of the barge unloading facility is not expected to result in long term detectable or destabilizing impacts to the aquatic environment. Impacts to the aquatic resources would be within the bounds of the generic assessment. However, a significant expansion of the barge unloading facility necessary to accommodate, for example, a large shipping package such as a reactor vessel would require a site specific assessment. The environmental assessment may be performed by the U.S. Corps of Engineers as part of the review to permit the enlargement of the barge unloading facility.

In most cases, the aquatic environment required to support the decommissioning process is relatively small and is normally a very small portion of the overall plant site. Usually, the areas disturbed or utilized to support decommissioning are within the boundaries of the site operational areas and typically are immediately adjacent to the reactor, auxiliary, and control

buildings. Discharge permits to the aquatic environment for operation are almost always greater than planned or realized during decommissioning. In almost all cases examined, licensees expect to restrict activities to previously disturbed areas and operate within the limits of operational permits. |

The potential for adverse impacts are likely to be nondetectable or nondestabilizing regardless of the decommissioning option selected. The activity most likely to result in impacts to aquatic environments is specific to removal of shoreline or in-water structures. The decision to conduct these activities would not be dependent on the decommissioning option. The only option where shoreline or in-water structure removal appears to be guaranteed is for those plants where return to a "Greenfield" is desired or required. |

When there is a decommissioning activity outside the operational area, the significance of the potential impacts are more difficult to define and will depend on site-specific considerations. The primary factors that need to be considered include the total acreage of habitat to be disturbed, and the overall importance of the plant or animal species or communities to be disturbed. If important resources may be affected by the decommissioning activities, the impacts may be detectable and destabilizing. |

Current or anticipated decommissioning activities at the FBR or HTGR have not and are not expected to result in aquatic ecology impacts that are different from those found at other nuclear reactor facilities. |

4.3.5.4 Conclusion

The staff has considered available information on the potential impacts of removing facility structures or contaminated soil from or near the aquatic environment on the aquatic ecological resources, including comments received on the draft of Supplement 1 of NUREG-0586. For facilities where disturbance of lands beyond the operational areas is not anticipated, the impacts on aquatic ecology are not detectable or destabilizing. The staff believes that activities within operational areas including the removal of shoreline or in-water structures, will have minimal impact on aquatic resources provided all applicable BMPs are employed and required permits are obtained. Therefore, the staff makes a generic conclusion that for such activities, the potential impacts to aquatic ecology are SMALL. The staff has considered mitigation measures and concludes that no additional mitigation measures are likely to be sufficiently beneficial to be warranted. |

If disturbance beyond the operational areas is anticipated, the impacts may or may not be detectable or destabilizing, depending on site-specific conditions and cannot be predicted |

I generically. Therefore, the staff concludes that if disturbance beyond the operational areas is
I anticipated, the potential impacts may be SMALL, MODERATE, or LARGE, and must be
I determined through site-specific analysis.

4.3.6 Terrestrial Ecology

I Terrestrial ecology considers all of the plants, animals, and species assemblages in the vicinity
I of the nuclear power facility as well as the interaction of those organisms with each other and
I the environment. Evaluations of impacts to terrestrial ecology are usually directed at important
I habitats and species, including plants and animals that are important to industry, recreational
I activities, the area ecosystems, and those protected by endangered species regulations and
I legislation. Federally listed threatened and endangered species, and designated critical habitat
I for such species, are addressed in a separate section of this Supplement (Section 4.3.7).
I There are also many species identified by State agencies as endangered or threatened, and
I potential impacts to such species should be evaluated and mitigated, as appropriate. Important
I habitat resources include (but are not limited to) wetlands, riparian areas, resting or nesting
I areas for large numbers of waterfowl, rookeries, communal roost sites, strutting or breeding
I grounds for gallinaceous birds, calving grounds, and areas containing rare plant communities.
Some States have programs to formally designate priority or rare habitat community types.

4.3.6.1 Regulations

I Federal statutes that are directly applicable in a NEPA evaluation of terrestrial ecology issues
I include the ESA of 1973, the Migratory Bird Treaty Act of 1918 (MBTA) (16 USC 703-712), and
I portions of other statutes, such as the wetlands provisions of the CWA (see Section 4.3.5.1,
"Regulations").

The MBTA was initially enacted in 1918 to implement the 1916 Convention between the United States and Great Britain (for Canada) for the protection of migratory birds. Specifically, the Act established a Federal prohibition, unless otherwise regulated, to pursue, hunt, take, capture, or kill any bird included in the terms of the convention, or any part, nest, or egg of any such bird. The MBTA was amended in 1936 to include species included in a similar convention between the United States and Mexico, in 1974 to include species included in a convention between the United States and Japan, and in 1978 in a treaty between the United States and the Soviet Union. Executive Order 13186 (2001) further defined the responsibilities of Federal agencies, such as the NRC, to ensure the protection of migratory birds and to consider potential impacts to migratory birds during the preparation of NEPA documents.

4.3.6.2 Potential Impacts of Decommissioning Activities on Terrestrial Ecological Resources

Table E-3 in Appendix E identifies stabilization, large-component removal, structure dismantlement, and decontamination and dismantlement as activities that may affect terrestrial ecology. Terrestrial ecological resources may be impacted during the decommissioning process via direct or indirect disturbance of native plant or animal communities in the vicinity of the plant site. Direct impacts can result from activities such as the clearing of native vegetation or filling of a wetland. Indirect impacts may result from effects such as erosional runoff, dust, or noise. During decommissioning, land at the site may be disturbed for the construction of laydown yards, stockpiles, and support facilities. Additionally, land away from the plant site may be disturbed to upgrade or install new transportation or utility systems. For example, building a new rail line may be necessary to support large-component removal. Installing or altering existing transmission lines could also have an effect on the terrestrial environment. In most cases, land disturbances will result in relatively short-term impacts and the land will either recover naturally or will be landscaped appropriately for an alternative use after completion of decommissioning.

Minor impacts to terrestrial resources could result from dust generation due to ground disturbance and traffic, noise from dismantlement of facilities and heavy equipment traffic, surface erosion and runoff, and migratory bird collisions with crane booms or other construction equipment. Most of these minor, indirect impacts are temporary and will not be significant issues after the completion of decommissioning. The effects of such impacts can also be minimized using standard BMPs.

Impacts to terrestrial resources are considered to be detectable if they result in changes to local species populations or plant or animal communities beyond the typical levels of natural variability (i.e., normal year-to-year variations). The impacts are considered to be destabilizing if they result in the extirpation of important species or result in long-term changes in ecological functions (such as flow of energy), species richness, diversity, or proportion of invasive species.

4.3.6.3 Evaluation

At most commercial nuclear facilities, there is a relatively distinct operational area where most or all site activities occur (e.g., materials and equipment storage, parking, substation operation, facility service and maintenance, etc.). This operational area usually includes all areas within the protected area fence, the intake, discharge, cooling, and other associated structures, as well as adjacent paved, graveled, and maintained landscaped areas. The operational area may include the entire area disturbed during facility construction, but is often considerably smaller.

I Terrestrial habitats disturbed during the construction of the site will often continue to be of low
I habitat quality during plant operation and decommissioning. However, sensitive habitats can
I develop on the site or rare species can colonize the area disturbed during construction. This is
I especially true if the site has been in SAFSTOR for several decades. For example, reworking
I the ground surface during construction may have altered the surface-drainage patterns such
I that wetlands develop on the original construction site. Trees could grow to the point where
I they become usable as roosting or nesting sites for eagles, osprey, or wading birds. These
I habitats may be inhabited by sensitive species at the time of decommissioning. Rare species
I have colonized portions of the site at several operating commercial nuclear power plants.

I In most cases, the amount of land required to support the decommissioning process is
I relatively small and is a small portion of the overall plant site. Usually, the areas disturbed or
I utilized to support decommissioning are within the operational areas of the site and typically are
I within the protected area. Usually, there is sufficient room within the operational areas to
I function as temporary storage, laydown, and staging sites. In most cases, management,
I engineering, and administrative staff would have been assigned space in existing support or
I administration buildings. In some cases, the licensees have installed trailers or temporary
I buildings to house engineering and administrative staff or to otherwise support
I decommissioning. Most licensees expect to restrict decommissioning activities to highly
I disturbed operational areas but a few expect to use lands beyond the operational areas, as
I defined above. The licensees typically anticipate utilizing an area of between 0.4 ha (1 ac) to
I approximately 10.5 ha (26 ac) to support the decommissioning process. One facility (Big Rock
I Point) required a new transmission line ROW to provide electrical power to the plant site during
I decommissioning (this line will also provide power to the onsite independent spent fuel storage
I installation [ISFSI] after decommissioning is completed). However, construction of a new
I transmission line ROW is probably an unusual situation. It is expected that some sites will
I require the reconstruction or installation of new transportation links, such as railroad spurs, road
I upgrades, or barge slips. Activities conducted within the operational areas are not expected to
I have a detectable impact on important terrestrial resources. Activities conducted outside the
I operational areas may have detectable impacts, depending on the magnitude and type of
I activity and the resources potentially affected.

I None of the decommissioning options have a greater likelihood of resulting in detectable or
I destabilizing impacts to terrestrial resources. The selection of the decommissioning option is
I more likely to affect the timing of the impact on ecological resources than it is the magnitude of
I the impacts. DECON may require slightly more land area to support a larger number of
I simultaneous activities. The ENTOMB2 option would probably have the least likelihood of
I adverse impacts onsite because some large components may be left in place, reducing the land
I requirements needed for large construction equipment, waste storage, and barge or rail loading

areas. However, impacts of ENTOMB2 could be larger if additional land disturbance is required to install a concrete batch plant and associated material stockpiles. The potential impacts of SAFSTOR may be smaller than DECON, depending on the time over which activities are performed. If decontamination and dismantlement occur slowly over many years (incremental DECON), the same storage and staging areas can be reused for sequential activities. If many activities are performed over a short time period at the end of the SAFSTOR period, the impacts may be as large as those for DECON. The activity of demolition of construction material should not have significant nonradiological impacts beyond other decommissioning activities except for potential short-term noise and dust effects. |

Previous or anticipated decommissioning activities at the FBR or HTGR have not and are not expected to result in impacts on terrestrial ecology that are different from those found at other nuclear facilities. |

4.3.6.4 Conclusions

The staff has considered available information on the potential impacts of decommissioning activities on terrestrial resources, including comments received on the draft of Supplement 1 of NUREG-0586. For facilities where habitat disturbance is limited to operational areas, the impacts on terrestrial ecology are not detectable or destabilizing. Therefore, the staff makes a generic conclusion that for such facilities the potential impacts to terrestrial ecology are SMALL. The staff has considered mitigation measures and concludes that no additional mitigation measures are likely to be sufficiently beneficial to be warranted. |

If habitat disturbance beyond the operational areas is anticipated, the impacts may or may not be detectable or destabilizing, depending on site-specific conditions and cannot be predicted generically. Therefore, the staff concludes that if disturbance beyond the operational areas is anticipated, the potential impacts may be SMALL, MODERATE, or LARGE and must be determined through site-specific analysis. |

4.3.7 Threatened and Endangered Species

Plants and animals protected under the ESA of 1973 may be present at or near all commercial nuclear power facilities (Sackschewsky 1997). At operating plants, the most common potential impacts to endangered aquatic species are effects related to the operation of the cooling water system via impingement, entrainment, or occasional temperature or chemical effects. Because the cooling system is not used at a plant undergoing decommissioning, it is anticipated that the potential impacts of decommissioning on threatened or endangered aquatic species will normally be no greater than and likely far less than the potential impacts of plant operations. |

- | For terrestrial species that are threatened or endangered, the most common potential impacts
- | for operating plants are from transmission ROW maintenance activities. Most transmission
- | lines beyond the switchyard are expected to remain energized, even after a commercial nuclear
- | power facility closes operation, and the ROW maintenance activities are expected to continue.
- | Therefore, the potential impacts of decommissioning on terrestrial species will normally be no
- | greater than the potential impacts of plant operations.

4.3.7.1 Regulations

- The ESA is the Federal statute that is directly applicable in a NEPA evaluation of threatened and endangered species issues. The ESA is intended to protect plant and animal species that are threatened with extinction and to provide a means to conserve the ecosystems on which they rely. Under the ESA, the U.S. Fish and Wildlife Service (USFWS) is responsible for all terrestrial and freshwater organisms. Marine and anadromous fish species are the responsibility of the National Marine Fisheries Service (NMFS). The ESA prohibits the taking of listed species and the destruction of designated critical habitat for listed species. The term "take" means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in such conduct (16 USC 1532). The ESA applies to Federal agencies as well as individuals. However, in general, the prohibitions against take in respect to listed plant species are only applicable to Federal agencies or to individuals on Federal lands.

Section 7 of the ESA provides a means for Federal agencies to consult with USFWS and NMFS concerning impacts to endangered species resulting from Federal actions. Although USFWS and NMFS are the administering agencies, it is the responsibility of the action agency to determine the potential impacts of a proposed action (including licensing actions) on endangered or threatened species via the preparation of a biological assessment. If the consultation process results in a determination that there may be adverse impacts to listed species, Section 10 of the ESA provides a means for permitted takes that are incidental to otherwise legal activities.

4.3.7.2 Potential Impacts of Decommissioning Activities on Threatened and Endangered Species

- | Table E-3 in Appendix E indicates that stabilization, large-component removal, structural
- | dismantlement, and decontamination and dismantlement are activities that may affect
- | threatened or endangered species. Such species may be impacted during the decommission-
- | ing process either through direct take (kill, maim, or unable to reproduce) or via disturbances of
- | native plant or animal communities near the plant site that the species relies on for food or

shelter. Additionally, an extended period of SAFSTOR may allow the establishment of onsite populations of protected species that may be adversely affected by facility decontamination and dismantlement at the end of the storage period.

The greatest potential for impact to protected species is associated with physical alteration or dismantlement of the facilities, landscape, or aquatic environment. Impacts can result from activities such as the removal of near-shore or in-water structures (e.g., the intake or discharge facilities); the active dredging of a stream, river, or ocean bottom; the filling of a stream, bay, or wetland; or the clearing of native vegetation. Indirect impacts may result from runoff, sedimentation, dust generation, or noise disturbance. The aquatic environment at a plant site may be disturbed for the construction of support facilities to allow barges to dock or to bridge a stream or other aquatic area. Additionally, terrestrial and aquatic environments away from the plant site may be disturbed to upgrade or install new transportation or utility systems. For example, a new rail line may be necessary to support large component removal. Installing or altering transmission lines could also affect the terrestrial and aquatic environment. In most cases, disturbances will result in relatively short-term impacts and the environment and local populations will either recover naturally or impacts can be mitigated using standard BMPs. An important exception may occur if near-shore or in-water structure removal or land surface disturbances result in the establishment of nonindigenous or noxious plants and animals to the exclusion of threatened or endangered species.

Impacts to endangered or threatened species are considered detectable if there are changes (attributable to the facility) in the species behavior or in the local population size that are greater than normal year-to-year variation. Impacts would be considered destabilizing if they result in direct mortality or major behavior changes (such as abandonment of most suitable habitat areas in the plant vicinity) or if they otherwise jeopardize the local population.

4.3.7.3 Evaluation

Usually, very little land will be disturbed during decommissioning that was not used during regular plant operations or previously disturbed during construction of the facility. If all activities are confined to site operational areas (i.e., within protected area fences, intake, discharge, cooling, and other associated structures, and adjacent paved, graveled, and maintained landscaped areas), the impacts to terrestrial threatened or endangered species are expected to be minor and nondetectable. Any impacts that did occur would primarily result from increased noise and dust generation from physical alterations of the plant site and from increased truck

traffic to and from the site. If no disturbances occur beyond the operational areas of the site, it is expected that the impact to threatened or endangered terrestrial species will be relatively small, temporary, and mitigable. The impacts of activities beyond the operational areas would depend on the activity, the species potentially affected, and the mitigation options available.

Unless there are major structural changes in the aquatic environment, the potential for adverse impacts to aquatic threatened or endangered species is expected to be minimal and nondetectable. Impacts to aquatic threatened or endangered species resulting from runoff/sedimentation or chemical inputs during decommissioning will be significantly less than the potential entrainment and impingement impacts that were present when the plant was operating because of the drastically reduced water use.

The different decommissioning options will probably not differ significantly in potential impacts to threatened or endangered species, except in those cases where the plant is held in SAFSTOR for extended periods. In those cases, there is a greater potential for rare species to colonize areas that may subsequently be disturbed during the decommissioning process.

The likelihood of impacts to threatened and endangered species is related to their presence or absence. This issue requires consultation with appropriate agencies to determine whether threatened or endangered species are present and whether they would be adversely affected. Consultation under Section 7 of the ESA must be initiated to determine if protected species are near the plant. If species are identified, an assessment of the potential impacts of decommissioning must be determined. Previous or anticipated decommissioning activities at the FBR or HTGR have not and are not expected to result in impacts on threatened and endangered species that are different from those found at other nuclear facilities.

4.3.7.4 Conclusions

The staff has considered available information on the potential impacts of decommissioning on threatened and endangered species, including comments received on the draft of Supplement 1 of NUREG-0586. Based on this information, the staff has considered that the adverse impacts and associated significance of the impacts must be determined on a site-specific basis.

The ESA imposes two basic requirements on the NRC. First, the ESA requires the NRC to ensure that any action authorized, funded, or carried out by NRC is not likely to jeopardize the continued existence of any endangered or threatened species, or to result in the destruction or impairment of any critical habitat for such species. Second, the NRC is required to consult with the Secretary of the Interior (for freshwater and terrestrial species through the USFWS) or the Secretary of Commerce (for marine and some anadromous fish through the NMFS) to

determine if any listed species may be affected by an action. This consultation may be formal or informal, depending on the nature of the action, the species potentially affected, and the level of impacts to those species.

Acknowledging the site- and species-specific nature of threatened and endangered species and the special obligations imposed on the NRC by the ESA, the staff has concluded that the potential impacts to threatened and endangered species may be SMALL, MODERATE, or LARGE, and is not a generic issue. Informal consultation will be initiated by the NRC staff with the appropriate service after the licensee announces permanent cessation of operations. It is expected that any formal or informal consultation will be completed prior to the licensee beginning major decommissioning activities, which can occur 90 days after the submission of the post-shutdown decommissioning activities report (PSDAR). At that time, it will be determined whether such species could be affected by decommissioning activities and whether formal consultation will be required to address the impacts. Each State should also be consulted about its own procedure for considering impacts to State-listed species.

4.3.8 Radiological

The NRC considers radiological doses to workers and members of the public when evaluating the potential consequences of decommissioning activities. Radioactive materials are present in the reactor and support facilities after operations cease and the fuel has been removed from the reactor core. Exposure to these radioactive materials during decommissioning may have consequences for workers. Members of the public may also potentially be exposed to radioactive materials that are released to the environment during the decommissioning process. All decommissioning activities were assessed to determine their potential for radiation exposures that may result in health effects to workers and the public. This section considers the impacts to workers and the public during decommissioning activities performed up to the time of the termination of the license. Any potential radiological impacts following license termination are not considered in this Supplement. Such impacts are covered by the *Generic Environmental Impact Statement in Support of Rulemaking on Radiological Criteria for License Termination of NRC-Licensed Nuclear Facilities*, NUREG-1496 (NRC 1997).

4.3.8.1 Regulations

Decommissioning reactors in the United States continue to be licensed by the NRC and must comply with NRC regulations and conditions specified in the license. The regulatory standards for radiation exposure to workers and members of the public are found in 10 CFR Part 20 (see detailed discussion in Appendix G). Title 10 CFR Part 20 requires that the sum of the external and internal doses (total effective dose equivalent, or TEDE) for a member of the public may

not exceed 1 mSv/yr (0.1 rem/yr). Compliance is demonstrated by measurement or calculation, to show (1) that the highest dose to an individual member of the public from sources under the licensee's control does not exceed the limit or (2) that the annual average concentrations of radioactive material released in gaseous and liquid effluents do not exceed the levels specified in 10 CFR Part 20, Appendix B, Table 2, at the unrestricted area boundary. In addition, the dose from external sources in an unrestricted area should not exceed 0.02 mSv (0.002 rem) in any given hour or 0.5 mSv (0.05 rem) in 1 yr. Occupational doses are limited to a maximum of 0.05 Sv (5 rem) TEDE per year, with separate limits for dose to various tissues and organs.

Potential radiological impacts following license termination are not covered in this Supplement. Specific radiological criteria for license termination were added as Subpart E of 10 CFR Part 20 in 1997, and the basis for public health and safety considerations is discussed in NUREG-1496 (NRC 1997). These criteria limit the dose to members of the public to 0.25 mSv/yr (25 mrem/yr) from all pathways following unrestricted release of a property. In cases where unrestricted release is not feasible, the licensee must provide for institutional controls that would limit the dose to members of the public to 0.25 mSv/yr (25 mrem/yr) during the control period and to 1 mSv/yr (100 mrem/yr) after the end of institutional controls. These criteria will largely determine the types and extent of activities undertaken during the decommissioning process to reduce the radionuclide inventory remaining onsite.

Power reactor licensees are required to meet the requirements in 10 CFR 50.36a for effluent releases after permanent cessation of operations. Licensees are also required to keep releases of radioactive materials to unrestricted areas at levels as low as reasonably achievable (ALARA).

In addition to NRC limits on effluent releases, nuclear power facility releases to the environment must comply with EPA standards in 40 CFR Part 190, "Environmental radiation protection standards for nuclear power operations." These standards specify limits on the annual dose equivalent from normal operations of uranium fuel-cycle facilities (except mining, waste disposal operations, transportation, and reuse of recovered special nuclear and by-product materials). Radon and its decay products are excluded from these standards.

The NRC has not established standards for radiological exposures to biota other than humans on the basis that limits established for the maximally exposed members of the public would provide adequate protection for other species. In contrast to the regulatory approach applied to human exposures, the fate of individual nonhuman organisms is of less concern than the maintenance of the endemic population (NCRP 1991). Because of the relatively lower

sensitivity of nonhuman species to radiation, and the lack of evidence that nonhuman populations or ecosystems would experience detrimental effects at radiation levels found in the environment around nuclear power facilities, these effects are not evaluated in detail for the purposes of this Supplement.

4.3.8.2 Potential Radiological Impacts of Decommissioning Activities

As indicated in Table E-3 in Appendix E, all decommissioning activities have potential radiological concerns. Radiological impacts during decommissioning include offsite dose to members of the public and occupational dose to the work force at the facility. For this Supplement, public and occupational radiation exposures from decommissioning activities have been evaluated on the basis of information derived from recent decommissioning experience. Effluent releases anticipated during decommissioning were estimated from experiences in recent decommissioning activities from both PWRs and boiling water reactors (BWRs).

Many activities that take place during decommissioning are generally similar to those that occur during normal operations and maintenance activities. Those activities include decontamination of piping and surfaces in order to reduce the dose to nearby workers. Removal of piping or other components, such as pumps and valves, and even large components, such as heat exchangers, is performed in operating facilities during maintenance outages. However, some of the activities, such as removal of the reactor vessel or demolition of facilities, would be unique to the decommissioning process. Those activities would have the potential to result in exposures to workers who are close to contaminated structures or components, and to provide pathways for release of radioactive materials to the environment that are not present during normal operation.

4.3.8.3 Evaluation

At the cessation of plant operations, there are areas of the plant structures where residual radiation exceeds the radiation standards for license termination set forth in 10 CFR Part 20, Subpart E. One of the goals of decommissioning is to reduce this residual radiation to levels that would permit license termination. Most of the decommissioning activities listed in Table E-3 in Appendix E have the potential for radiological impacts. The staff expects that all of the activities that have potential radiological impacts will be conducted following approved procedures to keep doses ALARA and well within regulatory limits. Radiological impacts are considered to be undetectable and nondestabilizing, in the NEPA sense, if doses remain within regulatory limits.

For this Supplement, information gained from experience in decommissioning facilities has been used to evaluate radiological dose to workers and members of the public. Occupational

I doses, radionuclide emissions, and doses to members of the public during decommissioning
I were compared to those experienced during periods of routine operation at the same facilities
I or at similar facilities. They were also compared to estimates presented in the 1988 GEIS
I (NUREG-0586 [NRC 1988]). This comparison was intended to demonstrate that the
I radiological consequences actually experienced at facilities undergoing decommissioning were
I bounded either by the site's EIS for normal operations or by the 1988 GEIS. The data were
I also used to determine whether it was appropriate to update the estimates for these impacts as
I presented in the 1988 GEIS.

I In estimating the health effects resulting from both offsite and occupational radiation exposures
I as a result of decommissioning of nuclear power facilities, the staff used the risk coefficients
I per unit dose recommended by the International Commission on Radiological Protection (ICRP)
I (1991) for stochastic health effects such as development of cancer or genetic effects. The
I coefficients consider the most recent radiobiological and epidemiological information available
I and are consistent with those used by the United Nations Scientific Committee on the Effects of
I Atomic Radiation. The coefficients used in this Supplement are the same as those published
I by ICRP (1991) in connection with a revision of its recommendations for public and
I occupational dose limits. Excess hereditary effects are listed separately because radiation-
I induced effects of this type have not been observed in any human population, as opposed to
I excess malignancies that have been identified among populations receiving instantaneous and
I near-uniform exposures in excess of 0.1 Sv (10 rem). Regulatory limits for radiation exposure
I to specific organs and tissues are set at levels that would prevent development of nonstochastic
I effects. Therefore, nonstochastic effects, such as development of radiation-induced cataracts,
I would not be expected in any individual whose exposure remains within the regulatory limits.

I Occupational Dose: As part of the occupational dose analysis, data were collected for annual
I occupational doses, doses by activity, and total dose from decommissioning, when that
I information was available. Because many of the facilities that provided information have not
I completed the decommissioning process, the data included in this analysis is from both actual
I operating data and from projections for specific activities. Routine occupational doses as
I reported to the NRC were used to compare collective worker doses during normal operations to
I those experienced during decommissioning. Projections for specific activities were also used to
I determine which were the greatest contributors to the cumulative occupational doses over the
I entire decommissioning period.

I The data used for this evaluation are presented in Appendix G. Average occupational doses
I during the 5 years of normal operations preceding shutdown ranged from about 1.5 to
I 5 person-Sv (150 to 500 person-rem) per year for each reactor. The average annual collective
I doses during the years following shutdown were generally lower, ranging from less than 0.1 to

1.8 person-Sv (10 to 180 person-rem), although specific years during the most active decommissioning period may have produced collective worker doses comparable to, or greater than, those typically experienced during normal operation. Average annual doses to individual workers are also generally lower during decommissioning than during normal operation.

Table 4-1 compares cumulative occupational dose estimates from the 1988 GEIS (NRC 1988) to estimates for plants that are currently in the decommissioning process. The types of activities included in these estimates may vary between plants. For example, some estimates include doses from transportation or from activities related to spent fuel management, which are not considered part of the decommissioning process, as defined in the scope of this document. In general, estimates for currently decommissioning plants fell within the range of estimates in the 1988 GEIS, and in some cases were substantially lower than the Supplement 1 estimates for the corresponding type of reactor and decommissioning option.

The estimated cumulative doses for the entire decommissioning process ranged from about 3.5 to 16 person-Sv (350 to 1600 person-rem) for the facilities that provided data. Estimated doses for the reference facilities discussed in the 1988 GEIS ranged from 3 to 19 person-Sv (300 to 1900 person-rem). Because the range of cumulative occupational doses reported by reactors undergoing decommissioning was similar to the range of estimates for reference plants presented in the 1988 GEIS, it was not considered necessary to update the estimates in the previous document at this time.

Activities that resulted in the largest doses during decommissioning included removal of large components, such as the reactor vessel and steam generators. Dismantling the internal structures within the containment building was the activity producing the largest overall doses. Transportation and management of spent fuel each accounted for less than 10 percent of the total. Appendix G provides a more in-depth review of the exposures recorded and anticipated for various activities.

One of the major decommissioning activities that is not performed during routine operation or refurbishment is removal of the reactor vessel. Industry experiences from this activity were reviewed to estimate worker exposure and the amount of radioactive material removed (see Appendix H). As each utility performed this major activity, experiences were shared within the industry and the lessons learned have been used to reduce collective dose to workers and improve the process. Collective worker dose at these sites ranged from 0.14 to 1.8 person-Sv (14 to 180 person-rem). The dismantlement of radioactive structures for the ENTOMB2 option would involve placement of contaminated SSCs in the reactor or containment building.

Facilities could use a demolition process for dismantlement of uncontaminated or slightly contaminated structures; there is a potential for this activity to occur during the dismantlement phases of SAFSTOR, DECON, or ENTOMB1 options. The demolition debris could be disposed of onsite if nonradiologically contaminated. If the debris is radiologically contaminated, it could be sent to a LLW site (except for the ENTOMB1 option, where it would be disposed of in the reactor or containment building structure). However, in cases where the remaining activity was low enough that the licensee could meet the criteria in 10 CFR Part 20, Subpart E, and other regulations, the demolition debris could potentially be disposed onsite for either the DECON or SAFSTOR options. This process has been termed "Rubblication" (see Section 1.3). Rubblization would require a site-specific analysis. The site-specific analysis would be conducted at the time the LTP is submitted for the site. Occupational doses during the activity of crushing the material would be similar to those for dismantlement of the facility in preparation for demolition and offsite disposal. The occupational doses would need to meet the regulatory standards in 10 CFR Part 20. Disposal of the radiologically contaminated demolition debris onsite would also have to meet the radiological criteria for license termination given in 10 CFR Part 20, Subpart E.

Occupational doses to individual workers during decommissioning activities are estimated to average approximately 5 percent of the regulatory dose limits in 10 CFR Part 20, and to be similar to, or lower than, the doses experienced by workers in operating facilities. The average increase in fatal individual cancer risk to a worker during decommissioning, about 8×10^{-5} per year of employment, is less than 2 percent of the lifetime accumulation of occupational risk of premature death of 4.8×10^{-3} . Because the ALARA program continues to reduce occupational doses, no additional mitigation program is warranted.

Public Dose: This section addresses the impacts on members of the public from radiation doses caused by decommissioning activities, including doses from effluents as well as from direct radiation. To determine the relative significance of the estimated public dose for decommissioning, the staff compared dose projections for decommissioning with the historical (baseline) doses experienced at PWRs and BWRs during normal operations. The dose estimates were based on reports evaluating effluent releases during decommissioning efforts and are shown in Appendix G. Levels of radionuclide emissions from facilities undergoing decommissioning decreased because the major sources generating emissions in gaseous and liquid effluents are absent in facilities that have been shut down. However, decommissioning facilities continued to report low levels of radionuclide emissions that resulted from the residual radioactive materials remaining in the facilities. The doses to members of the public from these emissions were also very low. Collective doses to members of the public within 80 km (50 mi) were lower than 0.01 person-Sv (1 person-rem) per year at all decommissioning facilities for

Table 4-1. Comparison of Occupational Dose Estimates from NUREG-0586 (NRC 1988) to those for Decommissioning Reactors |

| Reactor Type/ Decommissioning Option | 1988 GEIS Estimates - Cumulative Occupational Dose, person-Sv (person-rem) | Range of Estimates for Decommissioning Plants - Cumulative Occupational Dose, person-Sv (person-rem) ^(a) |
|---|--|--|
| Boiling Water Reactors | | |
| DECON | 18.74 (1874) | 7 - 16 (700 - 1600) |
| SAFSTOR | 3.26 - 8.34 (326 - 834) | 3.5 (350) |
| ENTOMB | 15.43 - 16.72 (1543 - 1672) | — |
| Pressurized Water Reactors | | |
| DECON | 12.15 (1215) | 5.6 - 10 (560 - 1000) |
| SAFSTOR | 3.08 - 6.694 (308 - 664) | 4.8 - 11 (480 - 1100) ^(b) |
| ENTOMB | 9.16 - 10.21 (916 - 1021) | — |
| Other Reactors (HTGR; FBR) | — ^(c) | 4.3 (430) |

(a) These data are based on information provided by plants that are undergoing or have completed the decommissioning process. For facilities that have been completely decommissioned, they represent actual doses accumulated during the decommissioning period. For facilities that are still undergoing decommissioning, they represent a combination of actual doses accumulated during activities that have been completed and projected doses for future activities.

(b) The plant reporting a dose estimate of 1100 person-rem is designated as having elected the SAFSTOR option, however, the period between shutdown and active decommissioning was shorter than the minimum 10-year SAFSTOR period that was evaluated in the 1988 GEIS. Therefore, it may be more appropriate to compare the estimated dose for that facility to the 1988 GEIS estimates for the DECON option.

(c) The 1988 GEIS did not provide dose estimates for reactors other than reference light water reactors. Therefore, there are no previous estimates with which to compare the doses for decommissioning the HTGRs and FBR, which are somewhat unique in the commercial nuclear power industry. The dose estimates are expected to be consistent with PWRs and BWRs.

which data were available, and, in most cases, they were comparable to or lower than the doses from operating facilities. Doses to a maximally exposed individual were less than 0.01 mSv/yr (1 mrem/yr) at both operating and decommissioning facilities, which is well within the regulatory standards in 10 CFR Part 20 and Part 50. |

Offsite doses to the public attributable to decommissioning have been examined for both the maximally exposed individual and the collective doses to the population within 80 km (50 mi) of the plants. To date, effluents and doses during periods of major decommissioning have not differed substantially from those experienced during normal operation. Consequently, direct |

exposure and effluents in gaseous and liquid discharges are not expected to result in maximum individual doses exceeding the design objectives of Appendix I to 10 CFR Part 50, the dose and effluent concentration limits in 10 CFR Part 20, or the limits established by EPA in 40 CFR

Part 190. Both the average individual dose and the 80-km (50-mi) radius collective doses are expected to remain at least 1000 times lower than the dose from natural background radiation. It should also be noted that the estimated increased risk of fatal cancer to an average member of the public is much less than 1×10^{-6} . Previous or anticipated decommissioning activities at the FBR or HTGR have not and are not expected to result in occupational or public doses that are different from those found at other nuclear facilities.

4.3.8.4 Conclusions

The staff has considered available information, including comments received on the draft of Supplement 1 of NUREG-0586, on the potential radiological impacts of decommissioning. This information indicates that the radiological impacts of decommissioning will remain within regulatory limits. Therefore, the staff makes the generic conclusion that the radiological impacts of decommissioning activities are SMALL. The staff has considered mitigation measures and concludes that no additional mitigation measures are likely to be sufficiently beneficial to be warranted.

The staff also determined that the issue of the long-term radiological aspects of Rubblization or onsite disposal of slightly contaminated material could not be evaluated generically and would require a site-specific analysis. The site-specific analysis would be conducted at the time the LTP for the site is submitted.

4.3.9 Radiological Accidents

As indicated in the Introduction to this Supplement, the staff relies on the Waste Confidence Rule for determining the acceptability of environmental impacts from the storage and maintenance of fuel in the spent fuel pool. The Rule states, in part, that there is, "reasonable assurance that, if necessary, spent fuel generated in any reactor can be stored safely and without significant impact for at least 30 yrs beyond the licensed life for operation...of that reactor at its spent fuel storage basin" (54 FR 39767).^(a) However, for the purpose of public information, the staff has elected to include a discussion of potential accidents related to the spent fuel pool in this Supplement.

(a) The Commission reaffirmed this finding of insignificant environmental impacts in 1999 (64 FR 68005). This finding is codified in the Commission's regulations in 10 CFR 51.23(a).

The likelihood of a large offsite radiological release that impacts public health and safety from a facility that has permanently ceased operation is considerably lower than the likelihood of a release from an operating reactor that impacts public health and safety. This is because the potential accidents associated with reactor operation are no longer relevant after the reactor fuel has been removed. |

Radiological accidents considered in licensing nuclear power plants are classified as design basis accidents (DBAs) and severe (beyond design basis) accidents. DBAs are those accidents that both the licensee and the NRC staff evaluate to ensure that the plant can withstand normal and abnormal transients and a broad spectrum of postulated accidents without undue hazard to the health and safety of the public. Severe accidents are those that are beyond the design basis of the plant. They are more severe than DBAs because they may result in substantial damage to the fuel, whether or not there are serious offsite consequences. For the most part, DBAs focus on reactor operation and are not applicable to plants undergoing decommissioning. The only DBAs or severe accidents (beyond design basis) applicable to a decommissioning plant are those involving the spent fuel pool. These postulated accidents are not expected to occur during the life of the plant, but are evaluated to establish the design basis for the preventive and mitigative safety systems of the spent fuel storage facility. |

4.3.9.1 Regulations |

Regulations governing accidents that must be addressed by nuclear power facilities, both operating and shutdown, are found in 10 CFR Part 50 and 10 CFR Part 100. The environmental impacts of DBAs, including those associated with the spent fuel pool, are evaluated during the initial licensing process. The ability of the plant to withstand these accidents is demonstrated to be acceptable before issuance of the operating license. The results of these evaluations are found in license documentation, such as the staff's safety evaluation report, the final environmental statement (FES), and in the licensee's Final Safety Analysis Report (FSAR) or equivalent. The consequences for these events are evaluated for the hypothetical maximally exposed individual. The licensee is required to maintain the acceptable design and performance criteria throughout the life of the plant. |

In addition, Appendix E to 10 CFR Part 50 requires each licensee to develop emergency plans and implementing procedures to protect health and safety in the event of an accident. These plans and procedures are maintained up to date during the period of operation of the plant and until such time after the cessation of plant operations that the NRC grants relief from the emergency planning requirements. |

4.3.9.2 Potential for Radiological Accidents as a Result of Decommissioning Activities

Table E-3 in Appendix E indicates that fuel removal, organizational changes, stabilization, chemical decontamination, large component removal, decontamination and dismantlement, system dismantlement, entombment, and transportation are activities that may lead to radiological accidents. Many activities that occur during decommissioning are similar to activities, such as decontamination and equipment removal that commonly take place during maintenance outages at operating plants. However, during decommissioning such activities may be more extensive than similar activities during the period of reactor operations. Consequently, potential accidents associated with these activities may have a higher probability during decommissioning than when the plant is operating. Accidents that occur during these activities may result in injury and local contamination; they are not likely to result in contamination offsite. This section addresses worker injuries from radiological accidents. Injuries from other causes are addressed in Section 4.3.10, "Occupational Issues."

Once the reactor fuel has been moved to the spent fuel pool, the only DBAs contained in the plant's FSAR that are applicable are those associated with the spent fuel pool. These accidents are generally related to fuel handling or dropping heavy objects into the spent fuel pool. As long as the integrity of the spent fuel pool and its supporting systems is maintained, the potential impacts of accidents are bounded by the impacts of those for the spent fuel pool DBAs.

After permanent shutdown of the reactor, the only severe accident of concern is one where the fuel in the spent fuel pool becomes uncovered and results in a zircaloy fire. In this regard, the staff recently conducted a study of spent fuel pool accident risk at decommissioning nuclear power facilities to support development of a risk-informed technical basis for reviewing exemption requests and a regulatory framework for integrated rulemaking (NRC 2001b). As part of its effort to develop generic, risk-informed requirements for decommissioning, the staff determined the frequency of beyond-design-basis spent fuel pool accidents. The event initiators included:

- seismic events (earthquakes) aircraft crashes
- aircraft crashes
- tornadoes and high winds

- impact of a dropped heavy load (such as a fuel cask), resulting in pool drainage or compression or buckling of stored assemblies. |

Those spent fuel pool accident sequences that resulted in the spent fuel being uncovered were assumed to culminate in a zirconium fire. The consequences of a zirconium fire event are likely to be severe. The staff's study performed some bounding-consequences analyses. |

The impacts of accidents where onsite and offsite doses remain below those allowable for the workers or the public are considered to be undetectable. Accidents that are likely to be undetectable include temporary loss of services, certain decontamination-related accidents, such as liquid spills or leaks during in situ decontamination, and, in some cases, the temporary loss of offsite power or compressed air. The impacts of accidents that could result in offsite doses that exceed EPA's protective action guides (PAGs) (EPA 1991) are considered to be destabilizing. The only accidents that are likely to have destabilizing impacts are those that involve pool drainage that leads to a zirconium fire. |

4.3.9.3 Evaluation |

The information in this section is based on reviews of existing information from licensees' documents analyzing accidents from decommissioning activities and from a technical review of spent fuel pool accident risk at decommissioning nuclear power facilities. The review of spent fuel pool accidents at decommissioning reactors was performed to support development of a risk-informed technical basis for reviewing emergency plan exemption requests and a regulatory framework for integrated rulemaking (NRC 2001b). Further detail on the sources of information that were used to develop the analysis is given in Appendix I. Because the sources of information included the FBR and the HTGR, the results given in this section are applicable for these facilities. |

The accidents and malfunctions covered by licensing documents can be divided into five main categories: |

- Fuel-related accidents: These include maintenance and storage of fuel in the spent fuel pool and the movement of fuel into the pool, which could result in fuel rod drops, heavy load drops, and loss of water. |
- Other radiological- (nonfuel)-related accidents: These include onsite accidents related to decontamination or dismantlement activities (e.g., material-handling accidents or accidental cutting of contaminated piping) or storage activities (e.g., fires or ruptures of liquid waste tanks). |

- External events: These include aircraft crashes, floods, tornadoes and extreme winds, earthquakes, volcanic activity, forest fires, lightening storms, freezing, and sabotage.
- Offsite events: These consist solely of transportation accidents that occur offsite (transportation accidents are discussed in Section 4.3.17).
- Hazardous (nonradiological) chemical-related accidents: These have the potential for injury to the offsite public, either directly from the accident or as a result of further actions initiated by the accident.

A detailed list of the types of accidents that could occur in each of these five categories is given

I in Appendix I. Appendix I also contains a table showing the estimated dose consequences of
I accidents during the decommissioning period that were reported in various licensing-basis
I documents. The highest doses result from postulated fuel-related accidents and radioactive-
I material-related accidents. Information obtained from licensing-basis documents for the
I fuel-related accidents showed that the highest offsite doses were from the cask or heavy load-
I handling accidents, the accidents that assumed a 100 percent fuel failure, and the spent fuel-
I handling accidents. The postulated accident with the greatest estimated offsite dose was a
I spent resin-handling accident that had a calculated offsite dose consequence accident of
I 0.0096 Sv (0.96-rem) TEDE.

I The likelihood of an accident as well as its consequence are activity-dependent. Accidents
I related to dropping fuel elements occur only when the fuel is being moved. Accidents related to
I dismantlement activities would occur only during the decontamination and dismantlement
I process and not during a storage period or after a facility has been entombed. External events,
I however, could occur during any activity or decommissioning option. Table I-5 in Appendix I
I compares the types of accidents with the different activities that are performed during
I SAFSTOR, ENTOMB, and DECON.

I The staff has reviewed activities associated with decommissioning and determined that many
I decommissioning activities not involving spent fuel that are likely to result in radiological
I accidents are similar to activities conducted during the period of reactor operations. The
I radiological releases from potential accidents associated with these activities may be
I detectable. However, work procedures are designed to minimize both the likelihood of an
I accident and the consequences of an accident, should one occur, and emergency plans and
I procedures will remain in place to protect health and safety while the possibility of significant
I radiological accidents exists.

In addition to the licensing-basis documents reviewed, the staff's report, *Technical Study of Spent Fuel Pool Accident Risk at Decommissioning Nuclear Power Plants* (NRC 2001b), provides an analysis of the consequences of the spent fuel pool accident risk and includes a limited analysis of the offsite consequences of a severe spent fuel pool accident. These analyses showed that the consequences of a spent fuel accident could be comparable to those for a severe reactor accident. As part of its effort to develop generic, risk-informed requirements for decommissioning, the staff performed analysis of the offsite radiological consequences of beyond-design-basis spent fuel pool accidents using fission product inventories at 30 and 90 days and 2, 5, and 10 years. The results of the study indicate that the risk at spent fuel pools is low and well within the Commission's Quantitative Health Objectives. The risk is low because of the very low likelihood of a zirconium fire even though the consequences from a zirconium fire could be serious.

The Commission has considered the storage of spent fuel and has concluded in the Waste Confidence Rule in 10 CFR 51.23 that "... spent fuel generated in any reactor can be stored safely and without significant environmental impacts for at least 30 years beyond the licensed life for operation...." The staff has reviewed the potential accidents associated with spent fuel storage during decommissioning, the likelihood of the accidents, and the potential consequences of the accidents. Emergency plans and procedures will remain in place to protect health and safety while the possibility of significant radiological accidents associated with spent fuel exists.

4.3.9.4 Conclusions

The staff has considered available information, including comments received on the draft of Supplement 1 of NUREG-0586, concerning the potential impacts of non-spent-fuel-related radiological accidents resulting from decommissioning. This information indicates, that with the mitigation procedures in place, the impacts of radiological accidents are neither detectable nor destabilizing. Therefore, the staff makes the generic conclusion that the impacts of non-spent-fuel-related radiological accidents are SMALL. The staff has considered mitigation and concludes that no additional measures are likely to be sufficiently beneficial to be warranted.

The staff has considered available information, including comments received on the draft of Supplement 1 of NUREG-0586, on the potential impacts of spent-fuel-related radiological accidents resulting from decommissioning. The staff affirms the conclusions in the Waste Confidence Rule and concludes that the impacts of spent fuel storage are SMALL. The staff concludes that additional mitigation measures are not likely to be sufficiently beneficial to be warranted.

4.3.10 Occupational Issues

- I Occupational issues are related to human health and safety. The discussion here includes
- I physical, chemical, ergonomic, and biological hazards. This discussion does not include
- I radiological impacts, which are discussed in Section 4.3.8.

4.3.10.1 Regulations

- I The Occupational Safety and Health Act of 1970 (29 USC 651 et seq.) was enacted to
- I safeguard the health of the worker. Regulations implementing the act are found in Title 29
- I ("Labor") of the Code of Federal Regulations, Subtitle B, "Regulations Relating to Labor."
- I Subpart A of 29 CFR Part 1910 adopts, by reference, occupational safety and health standards
- I which have been found to be national consensus standards or established Federal standards.
- I Standards adopted in 29 CFR 1910.6 include, among others, standards of the American
- I National Standards Institute, the American Society for Testing and Materials, the American
- I Welding Society, the National Fire Protection Association, the National Institute for
- I Occupational Safety and Health, the Society of Automotive Engineers, and Underwriters
- I Laboratories. Specific safety and health regulations for Construction are included in 29 CFR
- I Part 1926. These regulations are administered by the Occupational Safety and Health
- I Administration (OSHA).

- I States may also develop and enforce State standards for occupational safety and health.
- I However, State agencies may not assert jurisdiction over any occupational safety or health
- I issue with respect to which a Federal standard has been issued under Section 6 of the
- I Occupational Safety and Health Act unless the State has a plan for the development and
- I enforcement of State standards. State plans for development and enforcement of State
- I standards are covered by 29 CFR Part 1902. Approved State plans for enforcement of State
- I standards are listed in 29 CFR Part 1952. These plans identify the State agency responsible
- I for development and enforcement of the State standards.

4.3.10.2 Potential Impacts of Decommissioning Activities on Occupational Issues

- I Table E-3 in Appendix E indicates that nearly all decommissioning activities may impact
- I occupational issues. Typical hazards of concern can be grouped into the following categories:
- I physical, chemical, ergonomic, biological, and radiological (Plog 1988). Radiological hazards
- I are discussed in Section 4.3.8, and other hazards are discussed in this section in the context of
- I decommissioning activities.

The impacts of decommissioning activities on occupational issues are considered detectable if the accident or injury rate during decommissioning exceeds average U.S. industrial accident rates. The impacts of decommissioning activities on occupational issues are considered destabilizing if the accident or injury rate during decommissioning becomes sufficiently large that decommissioning activities must be halted to address worker safety and the decommissioning schedule is threatened.

4.3.10.3 Evaluation |

Typically, any significant operation, such as decommissioning, will have an environment, safety and health (ES&H) plan that serves as the guidebook for anticipating and preventing any injury or harm occurring to the worker while working on that particular job. This plan addresses all the major occupational hazards and is used to ensure that OSHA, State, and other local standards are met. The site-specific ES&H plan for a decommissioning activity should be referred to for detailed information regarding specific worker health and safety information; the occupational hazards described in this Supplement should not be used for ensuring the protection of an individual worker health and safety.

Physical hazards: During the decommissioning process, the major sources of physical occupational hazards involve the operation and use of construction and transportation equipment. Vehicles, grinders, saws, pneumatic drills, compressors, and torches are some of the more common equipment that can cause injury if improperly used. Heavy loads, which are often moved about by cranes and loaders, must be controlled to avoid injury. The majority of these hazards will be part of dismantlement. Workplace designs and controls should be the first line of defense when preventing workplace injuries. Hard hats and other personal protective equipment (PPE) are also important interventions and can serve as a secondary protective measure should workplace controls fail.

Many activities during decommissioning, for example, the use of cutting torches, have the potential to initiate fires. These activities, which are common during construction and demolition, should be identified in advance. It is expected that precautions will be taken to minimize the likelihood of fires and that suitable measures will be available for dealing with fires should they occur.

Table 4-2. Predicted Noise Ranges from Significant Construction Equipment (EPA 1971)

| Equipment | Levels in dBA at 15 m (50 ft) |
|-------------------------------|----------------------------------|
| Trucks | 82-95 |
| Front loader | 73-86 |
| Cranes (derrick) | 86-89 |
| Pneumatic impact equipment | 83-88 |
| Jackhammers | 81-98 |
| Pumps | 68-72 |
| Generators | 71-83 |
| Compressors | 75-87 |
| Back hoe | 73-95 |
| Tractor | 77-98 |
| Scraper/grader | 80-93 |

Noise is also a physical hazard that will be significant during decommissioning. The majority of noise will come from equipment such as rivet busters, grinders, and fans. Table 4-2 lists the typical A-weighted sound levels (decibel [dBA] levels) of standard construction equipment without the use of noise control devices or other noise-reducing design features. Although workplace controls and designs are the best methods for reducing noise, PPE (e.g., earplugs) can also be used to protect against hearing loss. If workers need to use PPE, their ability to communicate effectively is reduced and safety may be compromised.

Temperature is a physical hazard that will vary, depending on the decommissioning location and the amount of indoor versus outdoor activity. Heat and cold stress should be considered in any decommissioning plans. Normal core temperatures are 37.6°C (99.6°F) or 37°C (98.6°F) as measured by mouth. Fluctuations in core temperatures of 1.1°C (2°F) below or 1.7°C (3°F) above the normal impair performance markedly. If this range is exceeded, health hazards, e.g., hypothermia or heatstroke, exist (Plog 1988).

Physical hazards are prevalent at all the decommissioning sites. The loudest dBA noise hazard at one plant was the fan noise of 107 dBA (see Section 4.3.16, "Noise"). One facility undergoing decommissioning provided information on the number of safety occurrences (minor and injuries), accident prevention notices, PPE violations, near misses, and OSHA reportables. Many PPE violations appear to be repeat offenders. Most of the injuries and incidents noted occur in the construction area. The maximum yearly number of incidents and injuries (37) appeared in 1998 with a high number of PPE violations (53) also occurring during this reporting year. Typically, no lost work time is attributed to injuries or incidents. |

Electrical hazards are a significant concern during decommissioning. During stabilization, licensees often rewire the site to eliminate unneeded electrical circuits or repower certain operations from outside. For SAFSTOR, monitoring equipment may need to be installed and some systems will need to be de-energized. All of these activities, plus various other activities (operating cranes near power lines, digging near buried cables, etc.), pose electrical threats to workers. Proper precautions should be taken to avoid injury. |

Chemical hazards: Inhalation and dermal contact with chemicals are serious worker health hazards. Ingestion is typically not a voluntary route of exposure but accidental ingestions (pipetting with mouth, siphoning gasoline, etc.) have been known to occur at the job site. Solvents and particulates are the two contaminants of greatest concern. Some of the key chemicals of concern found in building materials, paints, light bulbs, light fixtures, switches, electrical components, and high-voltage cables include asbestos, lead, polychlorobiphenyls (PCBs), and mercury. Other chemicals that have been found during decommissioning activities include low levels of potassium, sodium chromate, and nickel found in the suppression chamber. Also, quartz and cristobalite silica were detected during concrete demolition. Fumes, often including lead and arsenic, and smoke from flame cutting and welding are significant sources of chemical exposure during decommissioning.

Decommissioning involves many activities that expose workers to chemical hazards:

- chemical decontamination of the primary loop |
- removal of reactor components |
- decontamination of the piping walls |
- removal of contaminated soil |
- removal of radioactive structures |

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- removal of hydrocarbon fuel from storage
- removal of hazardous coatings
- removal of asbestos
- removal of chemical-containing systems, such as demineralizers and acid- and caustic-containing tanks
- removal of sodium and NaK residue.

Proper planning, workplace design, and engineering controls should be supplemented with PPE and appropriate administrative solutions to ensure adequate worker protection from not only chemical hazards but all hazards.

Chemical hazards at one facility undergoing decommissioning included lead and arsenic vapors, created from torch cutting and using the plasma arc, and quartz and cristobalite particulates, created from chipping and hammering. At the facility, air sample summary logs indicate a few exposures that exceeded OSHA's permissible exposure limit (PEL). Arsenic (PEL = 0.01 mg/m³) levels exceeded the PEL four times during the sampling period. The highest arsenic reading was 0.03 mg/m³ when using the torch and grinder to cut a hole during one activity. The same activity reported the only lead (PEL = 0.05 mg/m³) reading above PEL at 1.5 mg/m³. Quartz (PEL = 0.1 mg/m³) and cristobalite (PEL = 0.05 mg/m³) particulates greatly exceeded the PELs when using the chipping hammer (817.84 and 1.5 mg/m³, respectively). The drill and chipping hammer also created too much quartz dust (9.2 mg/m³).

Ergonomic hazards: The physiological and psychological demands of decommissioning work create ergonomic hazards in the workplace. Discomfort and fatigue are two indicators of ergonomic stress that can lead to decreased performance, decreased safety, and increased chance of injury (Plog 1988). The typical sources of ergonomic stress during decommissioning activities include mechanical vibrations, lifting, and static work. Workplace designs, work shifts, and breaks should be planned accordingly to avoid ergonomic stress.

Biological hazards: Biological hazards include any virus, bacteria, fungus, parasite, or living organism that can cause a disease in human beings (Plog 1988). Typical sanitation practices can help avoid the obvious vectors for disease. Having clean, potable drinking water, marking nonpotable water, and providing cleansing areas are the most important elements of a sanitation system.

Given that many nuclear reactor facilities undergoing decommissioning are old, there is an increased chance that workers will be exposed to molds and other biological organisms that grow in and on the buildings. Molds and fungus, when inhaled, can cause minor to serious pulmonary problems. Dermal contact could cause rash and/or irritation. A thorough inspection of the facility should be conducted and proper cleansing and PPE should be used when biological agents are identified.

In general, human health risks for most decommissioning options are expected to be dominated by occupational injuries to workers engaged in activities such as construction, maintenance, and excavation. Historically, actual injury and fatality rates at nuclear reactor facilities have been lower than the average U.S. industrial rates. Occupational injury and fatality risks are reduced by strict adherence to NRC and OSHA safety standards, practices, and procedures. Appropriate State and local statutes must also be considered when assessing the occupational hazards and health risks for any decommissioning activity. The staff assumes strict adherence to NRC, OSHA, and State safety standards, practices, and procedures during decommissioning. |

Previous or anticipated decommissioning activities at the FBR or HTGR have not and are not expected to result in occupational hazard issues that are different from those found at other nuclear reactor facilities.

4.3.10.4 Conclusions

The staff has considered available information, including comments received on the draft of Supplement 1 of NUREG-0586, on the potential impacts of decommissioning activities on occupational issues. This information indicates that the impacts on occupational issues are not detectable or destabilizing. Therefore, the staff makes a generic conclusion that for all plants, the potential impacts on occupational issues are SMALL. The staff has considered mitigation measures and concludes that no additional mitigation measures are likely to be sufficiently beneficial to be warranted. |

4.3.11 Cost

A decommissioning cost assessment is not a NEPA requirement. However, an accurate decommissioning cost estimate is necessary for a safe and timely plant decommissioning. Therefore, this Supplement includes a decommissioning cost evaluation, but the cost is not evaluated using the environmental significance levels nor identified as a generic or site-specific issue. |

4.3.11.1 Regulations

The regulatory procedure for decommissioning a nuclear power facility is set out principally in NRC regulations in 10 CFR 50.75, 50.82, 51.53, and 51.95. The regulations to ensure the safe and timely decommissioning of nuclear power facilities and the availability of decommissioning funds were originally established by the NRC in 1988. These regulations, principally 10 CFR 50.75, specify the minimum amount of funds that a LWR licensee must have to demonstrate reasonable assurance of sufficient funds for decommissioning. The minimum decommissioning funds required by the NRC reflect only the efforts necessary to achieve termination of the 10 CFR Part 50 license. Costs associated with other activities related to facility deactivation and site closure, including operation of the spent fuel storage pool, construction, operation, and decommissioning of an ISFSI, demolition of uncontaminated or decontaminated structures that meet release criteria, and site restoration activities after sufficient residual radioactivity has been removed to meet NRC license termination requirements are not included in the minimum decommissioning fund requirement.

- I The regulations in 10 CFR 50.75 also require that licensees submit, at least once every 2 years, a report on the status of its decommissioning fund, including specifying the amount of funds accumulated, and a schedule for accumulating the remainder to be collected. This report is to
- I be submitted annually for plants that are within 5 years of the end of licensed operations.
- I 10 CFR 50.75 (f)(i) also requires that each power reactor licensee shall report the status of its decommissioning trust fund annually if the facility has already closed (before the end of its licensed life).

In addition to the financial assurance requirements for decommissioning in 10 CFR 50.75, other requirements in 10 CFR 50.75 and 50.82 specify requirements for submitting cost estimates for decommissioning to the NRC:

- I • 10 CFR 50.75(f)(2) requires that a licensee shall, at or about 5 years prior to the projected
- I end of operations, submit a preliminary decommissioning cost estimate.
- I • 10 CFR 50.82(a)(4)(i) requires a licensee to provide an estimate of expected costs for the
- I activities being proposed in the PSDAR.
- I • 10 CFR 50.82(a)(8)(iii) requires a licensee to provide a site-specific decommissioning cost
- I estimate within 2 years following permanent cessation of operations.
- I • 10 CFR 50.82(a)(9)(ii)(F) requires a licensee to provide an updated site-specific estimate of
- I remaining decommissioning costs as part of its LTP.

The regulations in 10 CFR 50.82 also specify the criteria that a licensee must meet before they can withdraw funds from the decommissioning fund for decommissioning activities. |

4.3.11.2 Potential Impacts of Decommissioning Activities on Cost |

As indicated in Table E-3 in Appendix E, all aspects of decommissioning will have an impact on decommissioning costs. The potential impacts of decommissioning activities on cost vary due to the cost of waste management and disposal of the LLW generated during decommissioning and to the uncertainty associated with regulatory requirements. |

The variability in waste management and disposal arises because the Barnwell Low-Level Radioactive Waste Management Disposal Facility, the last remaining facility that is available to dispose of all classifications of LLW generated by all but two nuclear power facilities located throughout the United States, is scheduled to stop accepting waste from all NRC licensees except those located in the Atlantic Compact by 2009 (see NUREG-1307, Rev. 9, *Report on Waste Burial Charges* [NRC 2000]). However, decommissioning of most of the nuclear power facilities in the United States is not expected to occur until sometime after 2009. This cost uncertainty is generally applicable to most of the nuclear power facilities that are currently being decommissioned and those that will be decommissioned in the future. This cost uncertainty, however, is somewhat mitigated by the availability of the Envirocare disposal facility in Utah. Envirocare can accept most Class A LLW for disposal from any generator in the United States. (More than 95 percent of LLW generated during nuclear power facility decommissioning is Class A.) Other LLW storage and disposal sites are also currently being proposed. |

The uncertainty associated with regulatory requirements is a reflection of the different requirements and standards for cleanup applied by different States and localities. While NRC cleanup requirements for terminating a license are well defined, these other external requirements may significantly influence the cost of decommissioning. For example, local jurisdictions might impose additional requirements than those imposed by the NRC. The cost of the extra cleanup is not reflected in the decommissioning fund required by the NRC. |

4.3.11.3 Evaluation

The estimated cost of decommissioning all of the nuclear power facilities that have been built and operated in the United States is provided in Table 4-3 (in January 2001 dollars). The costs provided in the table are those estimated by the owners of the individual plants and reported to the NRC.

Shown in the table are the actual costs to complete the decommissioning and terminate the 10 CFR Part 50 licenses for each of those facilities that have reached this milestone of their life-cycle. Facility-specific estimates are also provided for each plant that has been permanently shut down and is either actively undergoing decommissioning or is in safe storage awaiting active decontamination and dismantlement. The costs shown are estimates developed by the licensee and reported in their PSDARs, site-specific cost estimate reports, LTPs, etc. These estimates are adjusted to January 2001 dollars.

Table 4-3 provides the range of costs estimated by utilities to decommission all of the nuclear power facilities that are currently operating or have not indicated an intent to permanently shut down. Cost ranges, rather than facility-specific cost estimates, are provided for these plants, reflecting the fact that these estimates are not as well developed as for those plants that have already permanently shut down. These cost ranges were developed from licensee-provided estimates in the March 1999 biennial decommissioning reports adjusted to January 2001 dollars.

Finally, Table 4-3 provides a range of decommissioning cost estimates for the ENTOMB options. These options have not been used or considered by any U.S. nuclear power facility licensee to date. Cost estimation methods for the ENTOMB options are, thus, not as well developed as for the DECON and SAFSTOR methods. The values quoted in the table were developed from an analysis of the two entombment scenarios described in Chapter 3 for a "reference" (i.e., typical) PWR and BWR. The reference PWR was assumed to be the Trojan Plant in Oregon; the reference BWR was assumed to be the Columbia Generating Station in Washington.

The cost of decommissioning results in impacts on the price of electricity paid by ratepayers. These impacts generally occur over the life of the facility as the decommissioning fund is being collected. However, for those nuclear reactor facilities that shut down prematurely (as is the case for the majority of the facilities identified in Table 4-3), the impact may also occur for a number of years after permanent shutdown while the under-collected portion of the fund continues to be collected.

This analysis assesses the impact of cost by evaluating the total cost to decommission a nuclear power facility and terminate its Part 50 license. This impact is summarized in Table 4-4. As can be seen, the cost to decommission a large (>200 MWe) nuclear power facility is estimated to range from \$150 million to \$700 million and is highly dependent on the factors discussed previously.

4.3.11.4 Conclusions |

The staff has reviewed these data, recognizing that an evaluation of decommissioning cost is not a NEPA requirement. This information is presented here as a summary of actual and predicted decommissioning costs based on recently available data. |

4.3.12 Socioeconomics |

There are two primary pathways through which nuclear power plant activities create socioeconomic impacts on the area surrounding the plant. The first is through expenditures in the local community by the plant work force, and direct purchases of goods and services required for plant activities. The second pathway for socioeconomic impact is through the effects on local government tax revenues and services. When a nuclear power plant is closed and decommissioned, most of the important socioeconomic impacts will be associated with the plant closure rather than with the decommissioning process. |

4.3.12.1 Regulations |

There are no Federal or State regulations pertaining to any particular level of socioeconomic impacts, as there are for some environmental effects. Socioeconomic impacts are an element of NEPA documentation that must be addressed and mitigated, if warranted. |

4.3.12.2 Potential Impacts of Decommissioning Activities on Socioeconomics |

As indicated in Table E-3 in Appendix E, all of the socioeconomic impacts of decommissioning are related to organizational or staffing changes. The impacts of decommissioning were assessed recognizing that the potentially large impacts of plant closure may occur simultaneously with those of the actual decommissioning activities. However, as indicated in Section 1.3, impacts related to the decision to permanently cease operations are outside the scope of this Supplement. |

Socioeconomic changes related to direct expenditures in the local community are considered not detectable if there is little or no impact on housing values, education and other public services, and local government finances, are not distinguishable from normal background variation due to other causes. Impacts on housing are considered not detectable when no discernable change in housing availability occurs, changes in rental rates and housing values are similar to those occurring statewide, and little or no housing construction or conversion |

Table 4-3. Cost Impacts of Decommissioning (in January 2001 Dollars)

| Nuclear Plant | Electric Power Generation Rating | Reactor Type | Decommissioning Option | Estimated Decommissioning Cost, \$ million |
|---------------------------------------|----------------------------------|--------------|------------------------|--|
| Decommissioning Completed | | | | |
| Fort St. Vrain | 330 MWe | HTGR | DECON | 230 (189 [1996]) ^(a) |
| Pathfinder | 59 MWe | BWR | SAFSTOR | 20 (13 [1992]) ^(a) |
| Shoreham | 809 MWe | BWR | DECON | 258 (182 [1994]) ^(a) |
| Currently Being Decommissioned | | | | |
| Big Rock Point | 67 MWe | BWR | DECON | 364 |
| Dresden, Unit 1 | 200 MWe | BWR | SAFSTOR | 340 |
| Fermi, Unit 1 | 61 MWe | FBR | SAFSTOR | 36 |
| GE-VBWR | 13 MWe | BWR | SAFSTOR | 10 |
| Haddam Neck | 619 MWe | PWR | DECON | 404 |
| Humboldt Bay, Unit 3 | 65 MWe | BWR | SAFSTOR | 284 |
| Indian Point, Unit 1 | 257 MWe | PWR | SAFSTOR | 259 |
| La Crosse | 50 MWe | BWR | SAFSTOR | 111 |
| Maine Yankee | 860 MWe | PWR | DECON | 400 |
| Millstone, Unit 1 | 660 MWe | BWR | SAFSTOR | 563 |
| Peach Bottom, Unit 1 | 40 MWe | HTGR | SAFSTOR | 65 |
| Rancho Seco | 913 MWe | PWR | SAFSTOR | 394 |
| San Onofre, Unit 1 | 410 MWe | PWR | SAFSTOR | 427 |
| Saxton | NA | PWR | SAFSTOR | 44 |
| Three Mile Island, Unit 2 | 792 MWe | PWR | SAFSTOR | 502 |
| Trojan | 1130 MWe | PWR | DECON | 250 |
| Yankee Rowe | 167 MWe | PWR | DECON | 244 |
| Zion, Unit 1 | 1085 MWe | PWR | SAFSTOR | 386 |
| Zion, Unit 2 | 1085 MWe | PWR | SAFSTOR | 495 |
| Currently Operating | | | | |
| 69 PWR Reactors | 486 - 1270 MWe | PWR | DECON/SAFSTOR | 264 - 695 |
| 35 BWR Reactors | 514 - 1265 MWe | BWR | DECON/SAFSTOR | 152 - 663 |
| "Reference PWR" | 1130 MWe | PWR | ENTOMB1/ ENTOMB2 | 290 - 400 |
| "Reference BWR" | 1100 MWe | BWR | ENTOMB1/ ENTOMB2 | 410 - 750 |

(a) Actual cost to complete the decommissioning and the year the license was terminated.

Table 4-4. Summary of Cost Impacts by Decommissioning Option and Reactor Type and Size
(January 2001 Dollars)

| Decommissioning Cost Range, \$million | | | | | | |
|--|---------------|---------------|---------------|---------------------|------|-----|
| Decommissioning Option | PWR < 200 MWe | PWR ≥ 200 MWe | BWR < 200 MWe | BWR ≥ 200 MWe | HTGR | FBR |
| DECON | 244 | 250 - 404 | 364 | >182 ^(a) | 189 | -- |
| SAFSTOR | 44 | 259 - 597 | 13 - 284 | 340 - 563 | 65 | 36 |
| DECON/SAFSTOR (currently operating reactors) | -- | 264 - 695 | -- | 152 - 663 | -- | -- |
| ENTOMB1/ENTOMB2 | -- | 290 - 400 | -- | 410 - 750 | -- | -- |

(a) Cost data from the Shoreham plant, which only generated one effective full power day. There was little or no contamination to many plant systems. Not representative of other large BWRs.

occurs. Detectable impacts result when there is a discernable increase or reduction in housing availability, rental rates and housing values exceed the inflation rate elsewhere in the State, or more than minor housing conversions and additions or abandonments occur. Destabilizing impacts occur when project-related demand results in a very large excess of housing or very limited housing availability, where there are considerable increases or decreases in rental rates and housing values, or when substantial conversion or abandonment of housing units occurs.

Socioeconomic changes related to tax revenues and services (education, transportation, public safety, social services, public utilities, and tourism and recreation) are considered not detectable if the existing infrastructure (facilities, programs, and staff) could accommodate changes in demand related to plant closure and decommissioning without a noticeable effect on the level of service. Detectable impacts arise when the changes in demand for service or use of the infrastructure is sizeable and would noticeably decrease the level of service or require additional resources to maintain the level of service. Destabilizing impacts would result when new local government programs, upgraded or new facilities, or substantial numbers of additional staff and unsupportable levels of resources are required because of facility-related demand.

4.3.12.3 Evaluation

The size of the work force varies considerably among operating U.S. nuclear power facilities, with the onsite staff generally consisting of 600 to 800 personnel per reactor unit. The average permanent staff size at a nuclear power facility ranges from 600 to 2400 people, depending on the number of operating reactors at the site. In rural or low-population communities, this number of permanent jobs can provide employment for a substantial portion of the local work

force. In addition to the work force needed for normal operations, many temporary personnel are required for various tasks that occur during outages. Between 200 and 900 additional workers may be employed during these outages to perform the normal outage maintenance work. These are work force personnel who may be in the local community only a short time, but during these periods of extensive maintenance activities, the additional personnel could have a substantial effect on the locality. If, as expected, the decommissioning process requires a smaller work force than the onsite operating staff (typically 100 to 200 staff) and if the local economy is stable or declining, the result of the reduction in work force related to plant closure could be economic hardships, including declining property values and business activity, and problems for local government as it adjusts to lower levels of tax revenues. However, even the small decommissioning work force will tend to mitigate temporarily the full adverse socioeconomic effects of terminating operations.

If there is a net reduction in the community work force but the economy is growing, the adverse impacts of this ongoing growth (e.g., housing shortages and school overcrowding) could be reduced.

I If the decommissioning work force were substantially larger than the operating work force, the result could be increased demand for housing and public services but also increased tax revenues and higher real estate values. If the economy is characterized by decline, then decommissioning could temporarily reverse the adverse economic effects.

In a stable economy, a net increase in the community work force could lead to some shortages in housing and public services, as well as to the higher tax revenues and real estate values mentioned previously. In a growing economy, decommissioning could act as an exacerbating factor to the ongoing shortages that already might exist.

I Changes in work force and population: Changes of over 3 percent to local population in a single year are expected to have detectable effects, while changes of over 5 percent are expected to result in destabilizing impacts. These negative impacts include reduction of school system enrollments, weakened housing markets, and loss of demand for goods and services provided by local businesses. The size of the work force required during decommissioning, relative to that during operations, is an important determinant of population growth or decline.

I The impact from facility closure depends on the rate and amount of population change. If decommissioning begins shortly after shutdown with a large work force, then the impact of facility closure is mitigated. Facilities where layoffs are sudden and there is a long delay before active decommissioning begins are more likely to experience negative population-related socioeconomic impacts. Thus, large plants located in rural areas that permanently shut down early and choose the SAFSTOR option are the likeliest to have negative impacts. Considering all variables such as plant size and community size as the same, plants that go into immediate

DECON have less immediate negative impacts; the impacts from the ENTOMB option, assuming those preparations were made immediately after shutdown, would be less significant than those of SAFSTOR. |

Data on changes in work force were collected at facilities that are being decommissioned where information on operational and decommissioning work force is available. This information is presented in Appendix J, Table J-1. The table also shows total population in the host county at the time of plant shutdown, to indicate the potential importance of the facility closure. |

In order to identify any unusual downward trends in county population around the time of a facility shutdown, data were collected showing the range of percentage changes in population that have occurred at facilities currently being decommissioned. U.S. Census population data for the counties that house the decommissioning facility are used to assess changes in population around the time of shutdown by comparing percentage changes in the county population with State population changes during the same time period. This information is provided in Appendix J, Table J-2. |

In only two cases did the corresponding county populations decline around the time of the closure (Indian Point, Unit 1, in Westchester, New York, and Millstone, Unit 1, in New London, Connecticut). However, during the same time period that the host counties experienced population declines, the hosting States also experienced population declines. This suggests that the decline in the county population was part of an overall State population trend. Observing population trends over a decade may not capture small population declines or reductions in the rate of growth from one year to the next; however, longer trends should indicate whether or not the county had any large destabilizing population or housing impacts from the facility closure. |

In 18 out of the 20 facility case studies where populations grew, the populations of the counties where the facilities are located increased more rapidly or at the same rate as the State population. The two cases where the populations of the counties grew at a slower rate include relatively rural counties in California (Humboldt and Alameda) during time periods when the State of California experienced very high urban population growth. In general, experience of decommissioning facilities to date does not show any impacts from population change, either because the closure-related changes were small relative to the population base or because they were offset by other growth in the area. |

Local tax revenues: Changes in tax revenues of less than 10 percent are considered not detectable, i.e., they result in little or no change in local property tax rates and the provision of public services. Losses between 10 percent and 20 percent result in detectable impacts, with increased property tax levies (where State statutes permit) and decreased services by local municipalities. Changes over 20 percent have destabilizing impacts on the governments involved. Tax levies must usually be increased or services cut substantially, and the payment of debt for any substantial infrastructure improvements made in the past becomes problematic. |

Borrowing costs for local jurisdictions may also increase because bond rate agencies downgrade their credit rating. However, it is important to remember that these rules of thumb are based on uncompensated changes. For example, if a local taxing jurisdiction lost a nuclear facility that amounted to 35 percent of its tax base, but 30 percentage points of this loss were made up by the opening of a new manufacturing facility, the net impact would be 5 percent or not detectable. Small, rural areas are more likely to be affected than more urban areas having a wider variety of economic opportunities and more sources of tax revenue. Impacts depend on the type of plant, size of plant, and whether or not there are multiple units at a site, all of which help determine the net loss in employment at plant closure as well as the loss of tax base.

More information is available for facilities that have recently closed than for facilities closed more than 10 years ago (see Appendix J, Table J-3). The findings from this body of evidence confirm the findings discussed above. The primary taxing authorities for most of the decommissioning plants are the county and city in which the facility is sited. Tax information is typically provided by local taxing authorities (assessor's office) or from town planners familiar with the tax revenues generated by the facility.

The tax revenue impacts on the local communities of facility closure range from zero impact (tax-exempt plants) to loss of 90 percent of the community tax base. The magnitude of tax-related impacts varies primarily by the size of the taxing jurisdiction and the taxing structure of the State in which the plant is sited, as well as certain plant characteristics. Hence, the smaller the taxing community (less economically diverse), the greater the tax revenue impact when the nuclear facility closes down.

In communities where the revenues from the facility made up over 50 percent of the tax revenue base (with the remaining tax revenues made up primarily of private residential real estate), there were significant increases in the tax rates on the remaining real estate as well as cut-backs in services provided by property-tax revenues. The manner in which a State calculates the value of the plant also affects both the amount and timing of tax losses when a nuclear power facility closes and how much such a closure disrupts the tax revenue stream in a given community:

- At one plant, the assessed value of the plant was calculated as a proportional share of the value of the parent corporation, where the percentage is based on the book value of assets in the State (or sub-State taxing jurisdiction) compared with the book value of the assets of the entire corporation. This approach kept the plant at full assessed value for 7 years after its permanent closure until it was dropped from the books of the parent corporation as an asset. Several other approaches are discussed in Appendix J.
- Tax rules may or may not permit gradual phase-out. In some cases, the taxable asset value of the plants was allowed to phase out over a period of time (3 to 5 years). In other cases, the plants were simply taken off the tax roles in 1 year.

- The State may or may not share the burden with local government. In one State, school districts' lost property-tax collections were offset by equalization methods at the State level, which reduced the impact due to plant closures. In another State, the small neighboring township was the sole recipient of all property-tax revenues generated by the plant. Thus, the community's tax revenues were significantly reduced when the revenue source shut down.
- Utility ratepayers in some jurisdictions are entitled to share in funds recovered from sale of plant components and commodities and unspent decommissioning funds. These are not taxes but are available to general fund revenues.

In addition to characteristics specific to the taxing jurisdiction, the size, age, and ownership of the facilities play a role in how much the facilities affect tax revenues. Generally, the larger the facility (MWt), the larger the tax revenue impact. In addition, aging of the facility depreciates its book value and its assessed value over time. Usually, the falling assessed value of an aging facility will have reduced the tax revenue of the facility before closure, thus lessening the change in tax revenues generated by the facility after closure. A facility that closes suddenly, well before the end of its license expiration, will have a greater impact on the community tax base. Finally, if a facility is owned by a public entity, there is no effect on the tax base from closure because the facility was never taxable.

The choice of the decommissioning option appears to have had no bearing on the loss of tax receipts. The impact has to do with the size and suddenness of the loss of tax revenue (size and age of facility) related to plant closure only. The length of delay between shutdown and decommissioning does not appear to affect the size of the impact on tax revenue losses. No commercial nuclear power reactor has used the ENTOMB options, but there is no reason to expect ENTOMB to have any different impact on tax revenue losses than SAFSTOR or DECON.

Public services: The impacts of decommissioning on public services are generally much smaller than the impacts of plant closure. Impacts of closure are closely related to the tax-related impacts on the community and are affected by the same characteristics of the plant (size and age, tax treatment, and dependence of the local community on plant-related revenues), but not on the choice of decommissioning option or the amount of time between shutdown and active decommissioning. Inquiries were made to local governments in the vicinity of closed plants about public service impacts during and after shutdown and decommissioning. Their assessments are discussed in Appendix J and data are shown in Table J-4. Analysis was also conducted in the course of preparing NUREG-1437 (NRC 1996). Based on that experience, the following generalizations can be made.

Detectable impacts on housing result when there is a discernable increase or reduction in housing availability, when rental rates and housing values exceed the inflation rate elsewhere in the State, or when minor housing conversions and additions or abandonments occur.

I Destabilizing impacts occur when project-related demand results in a very large excess of housing or very limited housing availability, where there are considerable increases or
I decreases in rental rates and housing values, and when there is substantial conversion or
I abandonment of housing units. The prevailing belief of realtors and planners in communities
I surrounding the case study facilities is that closing the facilities has had a range of effects on
I the marketability or value of homes in the vicinity. Housing choices of local residents are rarely
I affected by the presence of the facility, but people may move into the area in response to
I (temporarily) softer housing prices and commute to a nearby urban area. However, the
I decommissioning process itself does not appear to have produced any detectable impacts on
I housing.

I The impacts to the following public services may occur as a result of plant closure: education,
I transportation, public safety, social services, public utilities, and tourism and recreation.

I In general, detectable impacts arise when the demand for service or use of the infrastructure is
I sizeable. Impacts would noticeably decrease the level of service or require additional resources
I to maintain the level of service. Destabilizing impacts would result when new programs,
I upgraded or new facilities, or substantial additional resources and staff are required because of
I facility-related demand. Specific information for each of the areas of public service for closed
I plants is provided in Appendix J.

I In general, the communities that suffered the most from the tax-related impacts of plant closure
I also experienced the greatest impacts on public services. To some extent, the communities
I themselves control the amount of impact by how they allocate property taxes to local budgets
I before shutdown, and how they prioritize these services post-shutdown. For example, one
I community channeled a great deal of the surplus revenues into building extensive social
I services for the elderly and for local youth in its community. After the plant ceased operations,
I the tax revenues decreased, all of the social services were downsized, and many will have to be
I eliminated because they are not considered priority programs (relative to public safety and
I education). In a second case, the county provided relatively few social services. Thus, the
I impact on social services after the shutdown was minor, although several other categories of
I public service experienced larger impacts. For example, education was largely funded by plant
I tax revenues and the responsible school district has recently indicated that it may have to file
I for bankruptcy, so the impact there was substantial^(a). However, all of these impacts were
I related to plant closure; in no case did the decommissioning process itself result in detectable
I impacts on public services.

I (a) The size of impact can be significantly influenced by the mechanism that the State uses for funding,
I e.g., if the State makes up the difference between what the local school districts can fund from the
I local property tax and what the State has decided is the appropriate level of per-student
I expenditures.

Previous or anticipated decommissioning activities at the FBR or HTGR have not and are not expected to result in impacts on socioeconomics that are different from those found at other nuclear facilities. |

Summary: The impacts of plant closure are those that are observed by the community, rather than the impacts from decommissioning activities because they occur at about the same time. The impacts occur either through changing employment levels and local demands for housing and infrastructure, or through decline of the local tax base and the ability of local government entities to provide public services. The effects of employment changes on population growth are expected to be not detectable if population changes (reductions or increases) are less than 3 percent per year, detectable but not destabilizing if the population change is between 3 percent and 5 percent, and destabilizing if the population change is greater than 5 percent per year. Experience so far has shown that in most cases, reductions in employment related to plant closure even at fairly large sites do not generally produce local population changes greater than 3 percent, regardless of the type of plant and decommissioning option selected. The impacts of the decommissioning work force are even smaller. |

The effect on the local tax base and public services related to closure depends on the size of the plant-related tax base relative to the overall tax base of local government, as well as on the rate at which the tax base is lost. Changes in annual tax revenues less than about 10 percent are considered nondetectable, i.e., they result in little or no change in local property tax rates and the provision of public services. Losses between 10 percent and 20 percent result in detectable but not destabilizing impacts, with increased property tax levies (where State statutes permit) and decreased services by local municipalities. Changes over 20 percent have destabilizing impacts on the governments involved. Experience has shown that publicly owned tax-exempt plants will not have an impact through this mechanism. In addition, fully depreciated plants, or a plant that is located in an urban or urbanizing area with a large or rapidly growing tax base will also not be impacted by this mechanism. A large, newer, relatively undepreciated plant, located in a small, isolated community, is much more likely to exceed the 20-percent criterion. If the plant tax base is phased out slowly after closure in these circumstances, the impact is more likely to be mitigated. Neither the type of reactor nor the method chosen for decommissioning matters. |

Decommissioning itself has no impact on the tax base and no detectable impact on the demand for public services. |

4.3.12.4 Conclusions

The staff has considered available information, including comments received on the draft of Supplement 1 of NUREG-0586, on the potential impacts of decommissioning on socioeconomics. This information indicates that the impacts of decommissioning on socioeconomics are neither detectable nor destabilizing. Therefore, the staff makes the generic conclusion that the impacts on socioeconomics are SMALL. The staff has considered mitigation and concludes |

- I that no additional measures are likely to be sufficiently beneficial to be warranted.

4.3.13 Environmental Justice

- I An evaluation of environmental justice is performed to determine if minority and/or low-income groups bear a disproportionate share of negative environmental consequences. Executive Order 12898, dated February 16, 1994 (59 FR 7629), directs Federal executive agencies to consider environmental justice under NEPA. The Executive Order does not create whole new categories of impacts that need to be considered; nor does it create any right, benefit, or trust responsibility, substantive or procedural, that can be enforced by law or equity. It is designed to improve internal management of agencies to ensure that low-income and minority populations do not experience disproportionately high and adverse human health or environmental effects because of Federal actions.

Environmental justice has not been evaluated previously for decommissioning activities at reactor facilities.

4.3.13.1 Regulations

- I The CEQ has provided *Environmental Justice: Guidance Under the National Environmental Policy Act* (CEQ 1997). Although NRC is an independent agency, the Commission has
- I committed to undertake environmental justice reviews, and has provided specific information in Office Instruction LIC-203, Nuclear Reactor Regulation (NRR), *Procedural Guidance for*
- I *Preparing Environmental Assessments and Considering Environmental Issues* (NRC 2001a). The CEQ guidance and NRR instructions provide several key definitions and the framework for analysis.

- I Low-income population: Low-income populations in an environmental impact area should be identified where census block groups within the environmental impact area have (1) more than 50 percent low-income persons or (2) the percentage of persons in households below the
- I poverty level is significantly greater (typically, at least 20 percentage points) than in the geographical area chosen for comparative analysis. In identifying low-income populations, agencies may consider as a community either a group of individuals living in geographic
- I proximity to one another or a set of individuals (e.g., migrant workers or American Indians^(a)), where either type of group experiences common conditions of environmental exposure or effect.

Minority: Individuals who are members of the following population groups: American Indian and Alaska Native; Asian; Native Hawaiian and other Pacific Islander; Black or African

(a) For consistency, the term "American Indian" is used throughout this document to conform to the definition of "minority population."

American, not of Hispanic or Latino origin; or some other race and Hispanic or Latino (of any race).^(a) |

Minority population: According to the CEQ, minority populations should be identified where either (a) the minority population of the affected area exceeds 50 percent or (b) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis. In identifying minority communities, agencies may consider as a community either a group of individuals living in geographic proximity to one another or a geographically dispersed/transient set of individuals (e.g., migrant workers or American Indians), where either type of group experiences common conditions of environmental exposure or effect. The selection of the appropriate unit of geographic analysis may be a governing body's jurisdiction, a neighborhood, census tract, or other similar unit that is to be chosen so as not to artificially dilute or inflate the affected minority population. A minority population also exists if there is more than one minority group present and the minority percentage, as calculated by aggregating all minority persons, meets one of the above-stated thresholds. NRR adopted a standard of 20 percentage points as "meaningfully greater." |

Disproportionately high and adverse human health effects: When determining whether human health effects are disproportionately high and adverse, agencies are to consider the following three factors to the extent practicable: (a) whether the health effects, which may be measured in risks and rates, are significant (as used by NEPA), or above generally accepted norms (adverse health effects may include bodily impairment, infirmity, illness, or death); (b) whether the risk or rate of hazard exposure by a minority or low-income population, to an environmental hazard is significant (as used by NEPA) and appreciably exceeds or is likely to appreciably exceed the risk or rate to the general population or other appropriate comparison group; and (c) whether health effects occur in a minority or low-income population, affected by cumulative or multiple adverse exposures from environmental hazards. |

Disproportionately high and adverse environmental effects: When determining whether environmental effects are disproportionately high and adverse, agencies are to consider the following three factors to the extent practicable: (a) whether there is or will be an impact on the natural or physical environment that significantly (as used by NEPA) and adversely affects a minority or low-income population (such effects may include ecological, cultural, human health, economic, or social impacts on minority communities, low-income communities, or American Indian tribes when those impacts are interrelated to impacts on the natural or physical environment); (b) whether environmental effects are significant (as used by NEPA) and are or may be having an adverse impact on minority populations, low-income populations, or |

(a) "Other" may be considered a separate minority category. In addition, the 2000 Census included multi-racial data. Multi-racial individuals should be considered in a separate minority, in addition to the aggregate minority category. |

American Indian tribes that appreciably exceeds or is likely to appreciably exceed those on the general population or other appropriate comparison group; and (c) whether the environmental effects occur or would occur in a minority or low-income population, affected by cumulative or multiple adverse exposures from environmental hazards.

4.3.13.2 Potential Impacts of Decommissioning Activities on Environmental Justice

- I As indicated in Table E-3 in Appendix E, decommissioning activities that may affect environmental justice are related to organizational or staffing changes and offsite transportation issues.
- I However, the assessment of environmental justice is related to most of the other specific issues discussed throughout this Supplement. Any decommissioning activity that results in a disproportionate share of negative environmental consequences to minority or low-income groups has the potential to be an adverse environmental justice impact.
- I Detectability and destabilization, as they relate to environmental justice, must be defined in proportion to the minority and low-income populations that reside in the area of the power plant.
- I Proportionment must be determined at each site at the time of decommissioning.

4.3.13.3 Evaluation

- I Most of the environmental justice impacts relate to land use, environmental and human health, and socioeconomics. Impacts due to onsite land disturbance are likely to be not detectable because the amounts of land disturbance are generally very small and usually occur in areas of the site previously disturbed by construction or operation of the facility. Impacts from disturbances to offsite land will generally not occur because offsite land generally is not disturbed as a result of decommissioning. If offsite land disturbance is required (e.g., if a new offsite road or rail spur is needed to transport large components or waste from decommissioning), the impact on environmental justice is site-specific because it will depend on the location of the new route relative to low-income populations or other affected resources on which they may depend. Some minority and low-income populations normally live along rail lines and truck routes. Previous transportation analyses have found that the impacts would be small from normal operations or from accidents. Thus, no disproportionately high and adverse effects are expected for any particular segment of the population, including minority and low-income populations, that may live along proposed rail and truck routes. Siting and construction of these offsite transportation upgrades would include an evaluation of cultural and other resources in the disturbed areas. Usually, offsite physical environmental impacts of decommissioning will be not be detectable because offsite environmental impacts from decommissioning are generally not detectable.
- I Socioeconomic impacts on minority and low-income populations due to plant closure could range from nondetectable to destabilizing, depending on the distribution of job impacts within the community and the effects of plant closure on local tax revenues and public services; however, the impact of decommissioning would generally not be detectable. More generic

information on overall socioeconomic impacts can be obtained by observing demographic statistics. In the 21 decommissioning case studies observed, it was concluded that facility closure would not have a detectable socioeconomic impact on low-income and minority populations. In other words, there appears to be no indication that minority or low-income populations would suffer disproportionately high and adverse impacts from the closure of the facilities. Because decommissioning has even smaller effects, its impact also would have been not detectable. The environmental justice conclusions are based on demographic information, i.e., the overall impact of the facility on the community. Discussions were also held with community members at some sites. |

In addition, information provided by local government and social service providers helps determine the socioeconomic impacts on low-income and minority populations. In many of these case studies, the nuclear facilities are located in primarily white communities and tend to be located near bodies of water where upper-income real estate is built. Those that are employed by the facility tend to fall into the upper-income bracket within the communities where the facilities are located. Selected socioeconomic indicators are found in Appendix J, Table J-5, for the closed nuclear power plants studied. |

The determination of whether the minority or low-income populations are disproportionately highly and adversely impacted by facility decommissioning activities needs to be made on a site-by-site basis because their presence and their socioeconomic circumstances will be site-specific. Data indicate there is no reason to expect adverse socioeconomic impacts to be correlated with type of plant (see Table J-5). However, adverse socioeconomic impacts are correlated with large facility size, early shutdown, and small, isolated host communities. If minority and low-income populations are present, adverse impacts from facility closure would be somewhat more likely in small, isolated communities than in larger urban areas. It is not clear whether these effects would be disproportionately high and adverse. |

Previous or anticipated decommissioning activities at the FBR or HTGR have not and are not expected to result in environmental justice considerations that are different from those found at other nuclear facilities.

4.3.13.4 Conclusions

The staff has considered available information on the potential impacts of decommissioning on environmental justice, including comments received on the draft of Supplement 1 of NUREG-0586. Based on this information, the staff has concluded that the adverse impacts and associated significance of the impacts must be determined on a site-specific basis. Executive Order 12898 (59 FR 7629), dated February 16, 1994, directs Federal executive agencies to consider environmental justice under the National Environmental Policy Act 1969 (NEPA). Although the NRC is an independent agency, the Commission has committed to undertake environmental justice reviews. Subsequent to the submittal of the PSDAR, the NRC staff will consider the impacts related to environmental justice from decommissioning activities. |

4.3.14 Cultural, Historic, and Archeological Resources

Cultural resources include any prehistoric or historic archeological site or historic property, site, or district listed in or eligible for inclusion in the National Register of Historic Places or otherwise having significant local importance. The Federal agency (in this case the NRC) is responsible for the evaluations through consultations with the State Historic Preservation Officer (SHPO), or if appropriate, the Tribal Historic Preservation Officer (THPO), that is responsible for determining which sites or properties are of significant historic or archeological importance. The NRC is also responsible for including other interested parties and affected American Indian tribes. Disagreements between the parties are resolved by the Advisory Council on Historic Preservation.

Evaluation of the potential presence of cultural resources should not rely solely on a query of the SHPO database, but should be based on field surveys and evaluations of the site. Although these evaluations may have been performed as part of the initial environmental evaluation for the sites or as part of another licensing action (e.g., license renewal), the coverage and adequacy of earlier survey efforts needs to be re-evaluated in cases where an impact may occur. Earlier field surveys and methods may not conform to current standards.

4.3.14.1 Regulations

The Federal statute that is most directly applicable to cultural resource issues during the decommissioning process is the National Historic Preservation Act (NHPA) of 1966 as amended (16 USC 470 et seq.). This Act created the National Register of Historic Places (National Register) and requires the heads of all Federal agencies to consider the impacts of the undertakings on any cultural properties that are listed on the National Register or that are eligible for listing. Section 106 of the NHPA requires each Federal agency to identify, evaluate, and determine the effects of an undertaking on any cultural resource site that may be within the area impacted by that undertaking. This section also requires consultation to resolve adverse effects of an undertaking and establishes mechanisms to obtain and incorporate comments from consulting parties. Federal agencies are directed by 36 CFR Part 800 to comply with the stipulations of NHPA as well as pertinent cultural, historical, and archeological protection provisions of NEPA, the Historic Sites Act of 1935, and the Antiquities Act of 1906 and their implementing regulations. The Historic Sites Act of 1935 (16 USC 461-467) declared a national policy of preserving for the public historic sites, buildings, and objects of national significance. It also led to the establishment of the Historic Sites Survey, the Historic American Buildings Survey, and the Historic American Engineering Record within the National Park Service.

Most other cultural, historical, and archeological protection regulations are primarily directed at resource protection on Federal lands, but in some cases these statutes may be applicable to the decommissioning of commercial power reactors. Several commercial nuclear power reactors are located on Federal lands. The Antiquities Act of 1906 (16 USC 431-433) prohibits destruction of vertebrate fossils and archeological sites on Federal lands and regulates their

removal under a permitting procedure. These regulations were further strengthened by the Archeological Resources Protection Act of 1979 (16 USC 470aa-47011), which prohibits the willful or knowing destruction and unauthorized collection of archeological sites and objects located on Federal lands. It also establishes a permitting system for archeological investigations and requires consultation with concerned tribes prior to permit issue. The Native American Graves Protection and Repatriation Act of 1990 (25 USC 3001 et seq.) protects graves on Federal lands and establishes tribal ownership of human remains and/or associated funerary objects taken from Federal lands and requires the inventory and repatriation to the tribes of any remains or funerary objects held by Federal agencies. Certain more recent Executive Orders regarding consultation with American Indian tribes and protection of religious sites and values could also be relevant.

Many of the States also have statutes that protect cultural, historical, and archeological resources on State lands. Some States also have burial and cemetery statutes that apply to private land as well. These State-level statutes are usually administered through the appropriate SHPO.

4.3.14.2 Potential Impacts of Decommissioning Activities on Cultural, Historic, and Archeological Resources

As indicated in Table E-3 in Appendix E, decommissioning activities that have a potential to adversely impact cultural resources include stabilization, decontamination and dismantlement, and large component removal. These activities adversely impact cultural resources primarily via land disturbance, which could damage or destroy the resource, or alter the contextual setting of the resource. In addition to the direct effects of land clearing, indirect effects such as erosion and siltation may adversely affect some cultural resources. Decommissioning activities also may alter the site access and administrative protection of the resources.

In a few situations, the nuclear facility itself could be potentially eligible for inclusion in the National Register of Historic Places, especially if it is older than 50 years and represents a significant historic or engineering achievement. In this case, appropriate mitigation would be developed in consultation with the SHPO. Even for buildings that are less than 50 years old, the processes and engineering that were employed may be of interest and may be eligible for the Historic American Engineering Record.

Impacts to cultural, historical, or archeological resources are considered detectable if the activity has a potential to have a discernable adverse affect on the resources. The impacts are destabilizing if the activity would degrade the resource to the point that it would be of significantly reduced value to the future generations, such as physically damaging structures or artifacts or destroying the physical context of the resource in its environment.

4.3.14.3 Evaluation

- I In most cases, the amount of land required to support the decommissioning process is relatively small and is a small portion of the overall plant site. Usually, the areas disturbed or utilized to support decommissioning are within the operational areas of the site and typically are within the protected area. Usually, there is sufficient room within the operational areas to function as temporary storage, laydown, and staging sites. In most cases, management, engineering, and administrative staff would be assigned space in existing support or administration buildings. In some cases, the licensees have installed trailers or temporary buildings to house engineering and administrative staff or to otherwise support decommissioning. In most cases examined, the licensees expect to restrict decommissioning activities to highly disturbed operational areas but a few do expect to use lands beyond the operational areas. The licensees typically anticipate utilizing an area of between 0.4 ha (1 ac) to approximately 10.5 ha (26 ac) to support the decommissioning process. One facility (Big Rock Point) required a new transmission line right of way (ROW) to provide electrical power to the plant site during decommissioning (this line will also provide power to the onsite independent spent fuel storage installation [ISFSI] after decommissioning is completed). However, construction of a new transmission line ROW is considered an unusual situation. It is expected that some sites will require the reconstruction or installation of new transportation links, such as railroad spurs, road upgrades, or barge slips. Activities conducted within the operational areas are not expected to have a detectable effect on important cultural resources because these areas have normally been highly degraded during facility construction and operation. Activities conducted outside of the operational areas may have detectable impacts, depending on the size and type of impact, and the cultural resources potentially affected.
- I The potential for adverse impacts is probably not affected by the type of facility (BWR, PWR, HGTR, or FBR) or the decommissioning option selected. However, the different decommissioning options are likely to alter the timing of the impact to cultural resources more than the magnitude of the impacts. DECON may require slightly more land area to support a larger number of activities occurring at the same time. ENTOMB2 would probably have the least likelihood of adverse impacts because some large components may be left in place, reducing the land requirements needed for large construction equipment, as well as waste storage and barge or rail loading areas. The potential impacts of SAFSTOR may be smaller than DECON or ENTOMB1, depending on the time period over which activities are performed. If dismantling and decontamination occur slowly over many years (incremental decontamination and dismantlement), the same storage and staging areas can be reused for sequential activities; however, if many activities are performed over a short time period at the end of the SAFSTOR period, the impacts may be as large as DECON.

4.3.14.4 Conclusions

- I The staff has considered available information on the potential impacts of decommissioning on cultural, historic, and archeological resources, including comments received on the draft of

Supplement 1 of NUREG-0586. For plants where the disturbance of lands beyond the operational areas is not anticipated, the impacts on cultural, historic, and archeological resources are not considered to be detectable or destabilizing. Therefore, the staff makes a generic conclusion that for such plants, the potential impacts to cultural, historic, and archeological resources are SMALL. The staff has considered mitigation measures and concludes that no additional mitigation measures are likely to be sufficiently beneficial to be warranted.

If disturbance beyond the operational areas is anticipated, the impacts may or may not be detectable or destabilizing, depending on site-specific conditions, and cannot be predicted generically. Therefore, the staff concludes that if disturbance beyond the operation areas is anticipated, the potential impacts may be SMALL, MODERATE, or LARGE and must be determined through site-specific analysis. Before the licensee conducts any decommissioning activity that might result in the disturbance of historic properties or archeological resources outside the site operational area, the NRC will, in accordance with the National Historic Preservation Act of 1966 as amended (16 USC 470 et seq.), consult with the appropriate SHPO or THPO to evaluate potential impacts.

4.3.15 Aesthetic Issues

Aesthetics is the study or theory of beauty and the psychological responses to it. Aesthetic resources include natural and man-made landscapes and the way the two are integrated. In this evaluation, aesthetic resources are considered to be primarily visual and relate the structures and the visual attributes of the decommissioning site.

4.3.15.1 Regulations

There are no regulations that relate specifically to the degree to which aesthetics may be impacted by a Federal project. The Bureau of Land Management (BLM), however, has developed a Visual Resource Management (VRM) system,^(a) which involves cataloging scenic values, establishing management objectives for those values through the resource-management planning process, and evaluating proposed activities to determine whether they conform with the management objectives. This system provides tools for identifying the visual resources of an area and assigning them to inventory classes. It also provides tools for determining whether the potential visual impacts from proposed activities or developments meet the management objectives established for an area or whether design adjustments will be required. This tool was designed to meet the BLM's responsibilities for maintaining scenic values of public lands. However, it does not directly apply to a decommissioning facility, where the landscape has already been altered by the facility's structure.

(a) VRM System (<http://www.blm.gov/nstc/VRM/vrmsys.html>), accessed July 7, 2001.

4.3.15.2 Potential Impacts of Decommissioning Activities on Aesthetics

Table E-3 in Appendix E indicates that structure dismantlement and entombment are activities that may have aesthetic impacts. Nuclear power facilities generally contain four main buildings or structures, as described in Chapter 3: the containment or reactor building, the turbine building, auxiliary building, and cooling towers (if any). Cooling towers and stacks may be clearly visible from a distance. Sites also contain a number of storage tanks, a large switchyard, and various administrative and security buildings. Decommissioning may include demolition or dismantlement of any of these structures. The switchyard may be left in place after the termination of the license because it is an integral part of the power distribution grid.

Levels of impacts for aesthetic resources are defined largely by the impact of the proposed changes as perceived by the public, not merely the magnitude of the changes themselves. The potential for significance arises with the introduction (or continued presence) of an intrusion into an environmental context, resulting in measurable changes to the community (e.g., population declines, property value losses, increased political activism, tourism losses).

Decommissioning activities and the changes that they bring are considered to have a nondetectable impact on the host communities' aesthetic resources if there are (1) no complaints from the affected public about a changed sense of place or a diminution in the enjoyment of the physical environment and (2) no measurable impact on socioeconomic institutions and processes. They are considered to have detectable but not destabilizing impacts on the host communities' aesthetic resources if there are (1) some complaints from the affected public about a changed sense of place or a diminution in the enjoyment of the physical environment and (2) measurable impacts that do not alter the continued functioning of socioeconomic institutions and processes. The activities are considered to have detectable and destabilizing impacts on the host community's aesthetic resources if there are (1) continuing and widely shared opposition to the activities or the changes the activities bring based solely on a perceived degradation of the area's sense of place or a diminution in the enjoyment of the physical environment and (2) measurable social impacts that perturb the continued functioning of community institutions and processes.

4.3.15.3 Evaluation

The aesthetic impacts of decommissioning fall into two sets: (a) impacts, such as noise, associated with decommissioning activities that are temporary and cease when decommissioning is complete and (b) the changed appearance of the site when decommissioning is complete.

Typically, nuclear power facilities are located in flat-to-rolling countryside in wooded or agricultural areas. In some cases, the facility structures are visible for many miles. In other cases, there are only a few views of the facility from the land, although it is more obvious from the water (lake, ocean, or bay).

Aesthetic issues related to construction and operation of facility structures were addressed in many (but not all) of the Final EISs prepared in response to applications for construction permits and operating licenses. In most cases, the visual impacts of the plant were said to have been mitigated to some extent by the surrounding topography or vegetation. In other cases, visible structures (such as cooling towers) were said to be "highly visible" but "the staff does not consider such an impact to be unacceptable." For decommissioning, the issue related to aesthetics is not one of placing another facility or building on a site, but one of removing buildings or structures. |

The issues evaluated in this section concern the impacts of decommissioning activities on aesthetic resources at and around all types of nuclear power facilities (PWRs, BWRs, HTGR, or FBR). During the decommissioning period, the appearance of the facility will be slowly altered if the buildings are dismantled. |

During decommissioning, the impact of activities on aesthetic resources would be temporary. The impacts would be limited both in terms of land disturbance and the duration of activity and would have characteristics similar to those encountered during industrial construction: dust and mud around the construction site, traffic and noise of trucks, and construction disarray on the site itself. In most cases, these impacts would not easily be visible offsite. Aesthetic impacts could improve fairly rapidly in the case of an immediate DECON if the licensee chooses to dismantle the facility, remove the structures, and regrade and revegetate the site before license termination. Impacts could also remain the same or similar in the case where the licensee maintains the structures throughout the decommissioning period and leaves them standing even after license termination (either after decontamination of the structures or possibly along with entombment of the reactor building) or throughout a long SAFSTOR period or ENTOMB. In these latter cases, the aesthetic impacts of the plant would be similar to those that occurred during the operational period. |

The removal of structures is generally considered beneficial to the aesthetic impacts of the site. In a few cases, where facilities have been located on the Great Lakes or ocean coast, the facility may have been used by boaters as a landmark. However, it is highly unlikely that this would become an issue that would preclude dismantlement of the facility structures.

The retention of the structures during a SAFSTOR period or the retention of structures onsite at the time the license is terminated is likewise not an increased visual impact, but instead a continuation of the visual impact analyzed in the facility construction or operations FES. The staff has not identified any mechanism that would result in a greater negative aesthetic impact than had previously been considered during the development of the construction FES.

Decommissioning activities will be conducted onsite, both inside and outside existing buildings (in the case of dismantlement or shipping activities). Any visual intrusion (such as the

dismantlement of buildings or structures) would be temporary and would serve to reduce the aesthetic impact of the site. At a minimum, the aesthetic impact of the site would not be improved but would remain that of an industrial site as evaluated in the facility's original FES.

- I Licensees are expected to use best-management practices (BMPs) to control many of the
- I potentially adverse impacts of decommissioning activities on aesthetics (e.g., dust and noise),
- I as discussed in other sections.

4.3.15.4 Conclusions

- I The staff has considered available information, including comments received on the draft of
- I Supplement 1 of NUREG-0586, on the potential impacts of decommissioning activities and the
- I changes in plant appearance on aesthetics. This information indicates that the impacts on
- I aesthetics are not detectable or destabilizing. Therefore, the staff makes a generic conclusion
- I that for all plants, the potential impacts on aesthetics are SMALL. The staff has considered
- I mitigation measures and concludes that no additional mitigation measures are likely to be
- I sufficiently beneficial to be warranted.

4.3.16 Noise

Noise is a "direct effect," as defined by Section 1508 of the CEQ Regulations for Implementing NEPA, i.e., effects caused by an action that occur at the same time and place as that action. For NRC licensees, the implementing regulations for NEPA are given in 10 CFR Part 51.

Noise is usually defined as sound that is undesirable because it interferes with speech, communication, or hearing; is intense enough to damage hearing, or is otherwise annoying. Noise levels often change with time. To compare levels over different time periods, several descriptors were developed that take into account this time-varying nature. These descriptors are used to assess and correlate the various effects of noise, including land-use compatibility, sleep and speech interference, annoyance, hearing loss, and startle effects:

- A-weighted sound levels (dBA) - typically used to account for the response of the human ear
- C-weighted scale (dBC) - generally used to measure impulsive noise such as air blasts from explosions, sonic booms, and gunfire
- day-night average sound level (DNL) - used to evaluate the total community noise environment. The DNL is the average A-weighted sound level during a 24-hour period with 10 dB added to nighttime levels (between 10 p.m. and 7 a.m.) to account for the increased human sensitivity to night-time noise events.

The discussions in this section relate to noise and related impacts that may be heard offsite. The impacts from noise to workers is addressed in Section 4.3.10.

4.3.16.1 Regulations

The EPA was given the jurisdiction in the Noise Control Act of 1972 (42 USC 4901 et seq.) to promulgate and enforce the regulations that were issued under the Act. Funding for EPA to perform this function was eliminated in early 1981. However, Congress did not repeal the Noise Control Act. The DNL was endorsed by the EPA and is mandated by the U.S. Department of Housing and Urban Development (HUD), the Federal Aviation Administration (FAA), and the Department of Defense (DoD) for land-use assessments. The EPA has determined that no significant effects on public health and welfare occur for the most sensitive portion of the population (within an adequate margin of safety) if the prevailing DNL is less than 55 dB (NAS 1977). The FAA bases its noise guidelines on land use. For residential uses, sound levels up to 65 dB are acceptable. Certain residential areas with sound-blocking features can handle up to 75 dB. For livestock farming and breeding, compatibility is considered to exist up to 75 dBA. These guidelines are advisory in nature and are not mandatory (14 CFR Part 150).

The Federal Housing Administration (FHA), under HUD, established noise assessment guidelines under 24 CFR 51B (1979; amended April 25, 1996). The FHA/HUD site acceptability levels are summarized as follows:

- Acceptable (DNL is 65 dBA or less) - Typical building materials and construction will make any impacts to indoor noise minimal. Outdoor recreation and activities would not be impacted. No approval requirements or abatement measures are needed under this condition.
- Normally unacceptable (DNL is 65 to 75 dBA) - Noise exposure will impact outdoor use of the area and indoor use may be affected. Walls or other barriers may be needed to reduce outdoor noise levels. Indoor noise levels may need to be reduced using special construction methods.
- Unacceptable (DNL above 75 dBA) - The noise conditions in this situation are unacceptable and activities need to be approved on a case-by-case basis.

Local and State regulations may also exist regarding noise restrictions and abatement decisions. Many States prohibit only nuisance noise and have not established specific numerical environmental noise standards, while others have very specific requirements. For example, the State of Maine has sound-level limitations for construction that are a function of time of day, area characteristics, and duration of the noise.

4.3.16.2 Potential Impacts from Noise of Decommissioning Activities

Table E-3 in Appendix E indicates that structure dismantlement is an activity that may have noise impacts. During the decommissioning process, the sounds that might be heard at offsite locations include noise from construction, vehicles, grinders, saws, pneumatic drills, compressors, and loudspeakers. Noise levels from these sources have to be compared to current noise levels of the operating facility and background noise present at the site to determine potential impacts. Table 4-5 lists predicted noise ranges for significant sources of noise during decommissioning.

Noise level increases larger than 10 dBA to the DNL at the site boundary during the day might be expected to lead to interference with outdoor speech communication, particularly in rural areas or low-population areas where the day-night background noise level is in the range of 45 to 55 dBA.

The noise impacts of decommissioning activities are considered detectable if sound levels are sufficiently high to disrupt normal human activities on a regular basis. The noise impacts of decommissioning activities are considered destabilizing if sound levels are sufficiently high that the affected area is essentially unsuitable for normal human activities, or if the behavior or breeding of a threatened or endangered species is affected.

Table 4-5. Predicted Noise Ranges from Significant Decontamination and Dismantlement Sources (INEEL 1999)

| Source | Source Strength dBA | Reference Distance, m | Predicted Noise Level Ranges (dBA) at Various Distances from the Reference Distance | | | |
|----------------------------|---------------------|-----------------------|---|-----------------|-----------------|---------------|
| | | | 150 m (500 ft) | 300 m (1000 ft) | 0.8 km (0.5 mi) | 1.6 km (1 mi) |
| Construction Equipment | 85-90 | 15 ^(a) | 65-75 | 59-69 | 51-61 | 45-55 |
| Truck | 85-90 | 15 | 65-75 | 59-69 | 51-61 | 45-55 |
| Rail Engine | 86-96 | 30 ^(b) | 76-86 | 71-81 | 64-74 | 58-68 |
| Rail Car, 64 km/h (40 mph) | 80-86 | 30 | 68-74 | 62-68 | 53-59 | 48-54 |

(a) 15 m ≈ 50 ft.
(b) 30 m ≈ 100 ft.

4.3.16.3 Evaluation |

When noise levels are below those that result in hearing loss, impacts are judged primarily in terms of adverse public reactions to the noise. Generally, surveys around major sources of noise such as large highways and airports find that, when the DNL increases above 60 to 65 dBA, noise complaints increase significantly (FICN 1992). FHA/HUD uses a DNL of 65 dBA as the primary criterion for impact on residential properties and nearby populations. The staff believes that noise levels below 60 to 65 dBA are considered to be insignificant. Business and institutional properties may be less sensitive to changes in noise levels, but all populations of concern should be considered when estimating the noise impact of decommissioning activities. |

Typically, operating reactor facilities do not result in offsite sound levels greater than 10 dBA above background. However, at some sites, sound levels at and above this level have been calculated at critical receptor locations. The principal sources of noise from facility operations are natural-draft and mechanical-draft cooling towers, transformers, and loudspeakers. Other occasional noise sources may include auxiliary equipment, such as pumps to supply cooling water from a remote reservoir. Generally, noise from these sources is not heard by a large number of people offsite. Of these sources, only loudspeakers would be anticipated to continue during the decommissioning period. The staff assumes that decommissioning activities will be scheduled to minimize high noise levels during the night and during critical periods for important animal species. |

In most cases, during decommissioning the sources of noise would be sufficiently distant from critical receptors outside the plant boundaries that the noise would be attenuated to nearly ambient levels and would be scarcely noticeable, as in the case for operating plants. However, in some cases, such as the use of equipment to demolish concrete, the noise levels offsite could be sufficiently loud (60 to 65 dBA at the nearest receptor site) that activities may need to be curtailed during early morning and evening hours. It is highly unlikely, based on past decommissioning experience, that the offsite noise level from a plant during decommissioning would be sufficient to cause hearing loss. However, in one case, noises at a facility being decommissioned have been reported at levels of up to 107 dB (dropping to 50 dB less than 1.6 km [1 mi] away) as a result of the spent fuel pool cooling system. Nearby residents complained to the plant staff about these noise levels; engineering changes were made in the fans that were causing the noise and the issue was resolved. |

The timing of the noise impacts and the duration or intensity will vary depending on the decommissioning option and the procedures that are used. More noise will occur during active dismantlement than during the storage period of SAFSTOR. Some demolition activities could increase noise levels temporarily. In addition to mitigation of noise levels based on engineering design, noise abatement procedures can be considered in decommissioning plans to reduce noise, particularly at night. |

I No differences are expected between the noise levels of future decommissioning activities at
I operating plants and the noise levels observed at facilities undergoing decommissioning. It is
I anticipated that most decommissioning activities will not represent an audible intrusion on
I the community for any type of nuclear power facility (BWR, PWR, HGTR, or FBR).

I **4.3.16.4 Conclusions**

I The staff has considered available information, including comments received on the draft of
I Supplement 1 of NUREG-0586, on the potential noise impacts of decommissioning activities.
I This information indicates that the noise impacts are not detectable or destabilizing. Therefore,
I the staff makes a generic conclusion that for all facilities, the potential noise impacts are
I SMALL. The staff has considered mitigation measures and concludes that no additional
I mitigation measures are likely to be sufficiently beneficial to be warranted.

4.3.17 Transportation

I In considering activities for decommissioning, transportation can be considered both an activity
I and an issue. Transportation of equipment, material, and waste is an activity that is performed
I throughout the entire decommissioning process. However, it is treated as an issue in this
I Supplement and is given its own section.

I This section addresses impacts related to transporting equipment and materials (radiological
I and nonradiological) offsite. Materials transported to offsite disposal facilities include nonhaz-
I ardous waste, LLW, hazardous waste, and mixed waste. As discussed in Chapter 1, the
I shipment of spent nuclear fuel is not within the scope of this Supplement. Radiological impacts
I include exposure of transport workers and the general public along transportation routes.
I Nonradiological impacts include additional traffic volume, additional wear and tear on roadways,
I and potential traffic accidents.

4.3.17.1 Regulations

I Regulations that apply to the transportation of hazardous, mixed waste, and radioactive
I material promulgated by the U.S. Department of Transportation (DOT) are contained in 49 CFR
I Parts 171-177. NRC regulations related to transportation of LLW are contained in 10 CFR
I Part 71, "Packaging and transportation of radioactive material." These regulations contain
I requirements for transport vehicles, maximum radiation levels for packages and vehicles,
I special packaging requirements, driver training, vehicle and packaging inspections, marking
I and labeling of packages, placarding of vehicles, and training of emergency personnel to
I respond to mishaps. Highway routing restrictions for certain shipments of LLW are also
I included in DOT regulations. NRC regulations contain performance requirements for certain

types of transportation packages of radioactive material. In addition, Federal and State regulations govern the size and weights of trucks. The staff assumes that equipment, materials, and waste transportation are conducted within applicable regulations.

4.3.17.2 Potential Decommissioning Impacts from Transportation

Table E-3 in Appendix E indicates that transportation-related activities may impact the transportation infrastructure and public health and safety. The types of transportation impacts for decommissioning nuclear power facilities and operating plants are similar. The factors that determine the magnitude of transportation impacts of decommissioning include:

- changes in waste production due to decontamination and dismantlement activities that increase the amount of waste shipped offsite
- changes in the transportation methods (rail, truck, or barge) related either to the increased amount to be shipped offsite or to the type of material to be shipped.
- changes in the mix of types of waste categories shipped offsite.

The public health impacts result from exposures of transport workers and the general public along transportation routes during normal shipments and from material released as a result of transportation accidents, as well as from transportation accidents that do not involve the release of radioactive material. The radiological impacts to public health and safety are considered detectable if the dose rates from shipping containers exceed regulatory limits. They are considered destabilizing if material is shipped in unapproved containers. The nonradiological impacts of transportation of radioactive waste are considered detectable or destabilizing if the vehicles are maintained or driven in a manner that would result in a significantly greater accident rate than experienced by the trucking industry.

The nonradiological, infrastructure impacts are increases in traffic density, wear and tear on roadways and railways, and transportation accidents. The impacts of decommissioning activities on the transportation infrastructure are considered detectable if the increased traffic causes a decrease in level of service or measurable deterioration of affected roads that can be directly tied to activities at the plant. The impacts of decommissioning activities are considered destabilizing if the level of service becomes unacceptable or roads become unusable because of activities at the plant.

4.3.17.3 Evaluation

The transportation impacts are dependent on the number of shipments to and from the facility, the type of shipments, the distance that material is shipped, and the nonradiological waste/fixed waste quantities and disposal plans. The distance that the waste travels depends on the plant's proximity to a disposal site. One decommissioning facility, located in Oregon, ships LLW 480

km (300 mi) to the U.S. Ecology burial site on the Hanford Reservation in Richland, Washington. Another decommissioning facility located in California ships LLW 4300 km (2700 mi) to the Barnwell facility in South Carolina.

The number of shipments and volume of waste shipped during the decontamination and dismantlement phases of decommissioning are greater than during operations. Information on shipments, which was received from nine plants, is shown in Appendix K. Because data on the waste volume of shipments were received from only seven plants, estimates of waste volume and shipment numbers in several cases (as footnoted in the table) reflect only a single facility and may be significantly higher or lower than for the average facility in that grouping. The impacts from FBRs and HTGRs would be encompassed by those for the PWRs and BWRs since the distance shipped is less and the plant sizes are generally smaller.

Nonradioactive material from the site for general disposal will likely be shipped to landfills. However, because licensees cannot release material with detectable amounts of radioactive material, a number of sites may ship much of their solid waste to vendors specializing in the management of LLW or to LLW sites such as that at Clive, Utah.

A generic analysis was conducted to estimate human health impacts associated with transporting decontamination and dismantlement wastes from reactor sites to LLW burial grounds. The RADTRAN 4 computer code (Neushauser and Kanipe 1992), which is commonly used for transportation impact calculations in support of environmental documentation, was used for the analysis. RADTRAN 5 (Neushauser and Kanipe 1996) is the latest version of the code, originally developed by Sandia National Laboratories to support the NUREG-0170 environmental impact analysis (NRC 1977). It uses the same basic methods for calculating impacts but does the calculations in a probabilistic framework.

Based on information from Trojan and Maine Yankee, LLW was categorized as one of three types--high activity, low activity, and very low activity--and a typical volume and activity were estimated for each type of LLW. The impacts of transporting each type of LLW were estimated. There are likely to be additional nonradiological impacts on public health and safety from transportation accidents associated with transportation of uncontaminated material.

Radiological impacts: For this Supplement, the public health and safety impacts of transportation of radioactive waste are evaluated on the basis of compliance with applicable regulations. The Commission has taken the position (46 FR 21619) that its "...regulations are adequate to protect the public against unreasonable risk from the transportation of radioactive materials." This evaluation was based, in part, on the findings of NUREG-0170 (NRC 1977). A recent re-evaluation of transportation risks, using updated information and assessment tools (Sprung et al. 2000), found that risks are lower than estimated in NUREG-0170. Licensees are expected to comply with all applicable regulations when shipping radioactive waste from decommissioning. Therefore, the effects of transportation of radioactive waste on public health and safety are considered to be neither detectable nor destabilizing.

Nevertheless, the staff performed an evaluation of the likely magnitude of these impacts using available data. Radiological impacts are divided into those for "routine" or incident-free shipments (i.e., the shipment reaches its destination without incident) and those for shipments that involve an accident with a subsequent radiological release. In each case, the impact is expressed in cumulative dose for the transport workers and public. The results of the calculations are shown in Table 4-6. The details of the assumptions made in the analysis are discussed in Appendix K. In order to bound the impacts, a distance of 4800 km (3000 mi) was selected. Dose rates for incident-free shipment of high-activity LLW were assumed to be at the regulatory limits, and dose rates for incident-free shipment of low-activity LLW were assumed to be at one-tenth of regulatory limits. Radiological impacts of shipment of very low-level activity LLW were assumed to be negligible compared to shipments of high-level and low-level activity LLW. However, shipment of very low-level activity waste was considered in evaluating nonradiological transportation of LLW. With these assumptions and the additional assumptions listed in Appendix K, the results of the analysis should bound the transportation impacts for all decommissioning options for PWRs and BWRs.

Ramsdell et al. (2001) indicate that shipment of spent fuel by rail reduces the radiological impacts significantly (more than a factor of 10 for shipments from the northeast to Nevada). Similar reductions would be expected in the radiological impacts of the shipment of LLW from decommissioning if shipments were made by rail rather than by truck. Barge shipments of the high-activity waste could reduce the radiological impacts even further.

Nonradiological impacts: Nonradiological impacts of transportation of LLW include increased traffic and wear and tear on roadways. Decommissioning experience has been that the number of LLW shipments from a site averages much less than 1 per day. This number of shipments per day is not nearly large enough to have a detectable or destabilizing effect on traffic flow or road wear.

Nonradiological impacts of transportation accidents are typically expressed in terms of fatalities. RADTRAN estimates fatalities caused by traffic accidents using the distance traveled and average fatality rates per unit distance. Traffic accidents are not related to radioactivity; therefore, the impacts of transportation accidents should be based on the round-trip distance between the decommissioning site and the waste facility. For consistency, a 9600-km (6000-mi) round-trip distance is assumed for the fatality estimates shown in Table 4-6. Again, these numbers reflect the entire decommissioning period. The fatality estimates would be the same for shipments of any other commodity.

The following values may provide some perspective for evaluating the values in Table 4-6. A recent publication (Saricks and Tompkins 1999) gives average accident rates on interstate highways. The average accident rates for trucks are 3.15×10^{-7} , 3.66×10^{-7} and 6.54×10^{-7} per kilometer (5.07×10^{-7} , 5.89×10^{-7} , and 1.05×10^{-6} per mile) for highways in rural, suburban, and urban areas, respectively. The national average fatality rate for trucks is 5.5×10^{-9} fatalities per

Table 4-6. Impacts of Transportation of LLW from Decommissioning

| | High-Activity Waste | Low-Activity Waste | Very Low-Activity Waste | Total |
|--|--|--|-------------------------|--|
| Number of Shipments during Decommissioning | 227 | 84 | 360 | 671 ^(a) |
| Incident-Free Transportation Impacts – Cumulative Dose, person-Sv (person-rem) | | | | |
| Crew | 0.496 (49.6) | 0.184 (18.4) | -- | 0.680 (68.0) |
| Public along route | 0.129 (12.9) | 0.020 (2.00) | -- | 0.149 (14.9) |
| Onlookers | 0.123 (12.3) | 0.019 (1.90) | -- | 0.142 (14.2) |
| Total | 0.748 (74.8) | 0.223 (22.3) | -- | 0.971 (97.1) |
| Incident-Free Transportation Impacts – Latent Cancer Fatalities (LCF) | | | | |
| Crew ^(b) | 0.0198 | 0.00736 | -- | 0.0272 |
| Public along route ^(c) | 0.0065 | 0.00100 | -- | 0.00744 |
| Onlookers ^(c) | 0.0062 | 0.00096 | -- | 0.00711 |
| Total | 0.0324 | 0.00931 | -- | 0.0417 |
| Accident Impacts | | | | |
| Cumulative Dose, person-Sv (person-rem) | 5.39×10 ⁻⁵ (5.39×10 ⁻³) | 1.28×10 ⁻⁴ (1.28×10 ⁻²) | -- | 1.82×10 ⁻⁴ (1.82×10 ⁻²) |
| Nonradiological Fatalities | 0.0120 ^(d) | 0.00465 ^(d) | 0.019 ^(d) | 0.0356 ^(d,e) |
| Total | | | | |
| Cumulative Dose, person-Sv (person-rem) | 0.748 (74.8) | 0.223 (22.3) | -- | 0.971 (97.1) |
| Fatalities | 0.0419 | 0.0136 | 0.0190 | 0.0745 ^(e) |
| (a) The total number of shipments during decommissioning may be significantly increased if State or local government agencies require removal of all structures and concrete from the site. However, the additional shipments would be uncontaminated material. (b) Assuming 4.0 × 10 ⁻² LCF/person-Sv (4.0 × 10 ⁻⁴ LCF/person-rem) for crew. (c) Assuming 5.0 × 10 ⁻² LCF/person-Sv (5.0 × 10 ⁻⁴ LCF/person-rem) for general public. (d) Based on fatal accident rate of 5.5 × 10 ⁻⁹ per km (8.8 × 10 ⁻⁹ per mi) (e) The number of fatalities will increase if there are additional shipments of uncontaminated material in proportion to the number of miles driven. | | | | |

kilometer (8.8 × 10⁻⁹ fatalities per mile). Historically, the accident rate for activities at nuclear facilities has been lower than the national average for similar activities because of the industry emphasis on training and adherence to established procedures.

It is not likely that the actual nonradiological impacts of transportation accidents would be as high as indicated or that they would be either detectable or destabilizing.

The number of shipments into the decommissioning facility would be much smaller than the number of shipments from the facility. The concrete used to entomb a plant would be manufactured at a batch plant onsite, or the licensee would use local sources for the materials needed for entombing a facility. Shipments of materials into the facility during decommissioning or following the preparation for entombment of the facility would be minimal. It is anticipated that many of the shipments to the facility undergoing decommissioning, including shipments of equipment and heavy machinery, would come from local sources and, thus, the distance traveled would be minimal. Therefore, the staff concludes that transporting the materials to the site would not significantly impact the overall traffic volume or compromise the safety of the public,

Previous or anticipated decommissioning activities at the FBR or HTGR have not and are not expected to result in impacts on transportation that are different from those found at other nuclear facilities.

4.3.17.4 Conclusions

The staff has considered available information, including comments received on the draft of Supplement 1 of NUREG-0586, on the potential transportation impacts of decommissioning activities. This information indicates that the transportation impacts are not detectable or destabilizing. Therefore, the staff makes a generic conclusion that for all plants, the potential transportation impacts are SMALL. The staff has considered mitigation measures and concludes that no additional mitigation measures are likely to be sufficiently beneficial to be warranted.

4.3.18 Irreversible and Irretrievable Commitment of Resources

Irreversible commitments are commitments of resources that cannot be recovered, and irretrievable commitments of resources are those that are lost only for a period of time. The irreversible and irretrievable commitments of resources that are anticipated during the decommissioning process are similar to those that were considered in the FESs for facility construction permits and operating licenses. The FESs for plant operation cite uranium as the principal natural resource irretrievably consumed in facility operation. However, following permanent cessation of operations, uranium is no longer consumed. As discussed in Chapter 1, disposal of uranium as part of spent nuclear fuel is not within the scope of this Supplement. Other resources considered in some FESs include land, water, human resources, cultural, and threatened and endangered species.

4.3.18.1 Regulations

CEQ regulations at 40 CFR 1502.13 and NRC regulations at 10 CFR 51, Appendix A to Subpart A, state that an environmental impact statement include a discussion of any irreversible or irretrievable commitments of resources. In addition, there are regulations that deal with the use of land (addressed in Section 4.3.1, "Onsite/Offsite Land Use"), water use and quality (Sections 4.3.2 and 4.3.3), and air quality (Section 4.3.4). Disposal of uranium is not within the

scope of this document. Land devoted to LLW disposal sites or in industrial landfills is also not within the scope of this document and is addressed in the licensing documents for the disposal site.

4.3.18.2 Potential Impacts of Decommissioning Activities on Irretrievable Resources

Table E-3 in Appendix E indicates that decommissioning activities with the potential to impact irreversible and irretrievable commitment of resources include structural dismantlement; LLW packaging, storage, and disposal; and transportation.

An irreversible commitment of resources is defined as a loss that is detectable and destabilizing, such as when a species becomes extinct, or, in the case of mining, when ore is removed. Irretrievable commitments can be considered as a tradeoff. If a transportation corridor is constructed, the land uses are not available for as long as the corridor remains. The destabilizing impacts are those that adversely impact the resources discussed in this Supplement (Sections 4.3.1 through 4.3.17).

4.3.18.3 Evaluation

Although most FESs addressed primarily uranium fuel, other resources were discussed in some of the FESs. This included land used for plant buildings, components such as large underground concrete foundations, and certain other equipment considered irretrievable due to practical aspects of reclamation and/or radioactive decontamination. The use of the environment (air, water, and land) by the facilities was not deemed to represent significant irreversible or irretrievable resource commitments but rather a relatively short-term investment.

Whether land is considered to be an irretrievable resource depends largely on the decisions at the time of license termination. If the license is terminated for unrestricted use, then the land will be available for other uses, whether or not the decommissioning process returned the land to a "Greenfield" site or to an industrial complex. If ENTOMB1 is selected, license termination could still allow unrestricted access after 30 to 60 years. However, if the ENTOMB2 option is selected, the land under the facility will not be available for alternative uses and would be considered irretrievable.

The only other irretrievable resources that would occur during the decommissioning process would be materials used to decontaminate the facility (e.g., rags, solvents, gases, and tools), and fuel used for construction machinery and for transportation of materials to and from the site. However, these resources are minor.

Although the use of land, water, air, and fuel oil during decommissioning is minimal or nonexistent, the disposal of radioactive waste and nonradioactive waste would be considerable for some options, such as DECON to a "Greenfield" (nonindustrial) site. Even though the disposal of radioactive waste is outside the scope of this document, the volume of land required for radioactive waste disposal is estimated in Table 4-7 for the SAFSTOR and DECON options, based on data obtained from six plants. The quantities of waste shown in Table 4-7 for the two

ENTOMB options were estimated based on the scenarios described in Chapter 3. The greatest estimated volume of radwaste is from a facility that is being decommissioned to "Greenfield" (no structures remaining onsite). It is located in a State that does not allow disposal of the industrial waste within an in-state industrial waste site.

Table 4-7. Volumes of Land Required for LLW Disposal^(a) |

| Decommissioning Option | Reactor Type | Volume of Land Required for LLW Disposal, m ³ (ft ³) | Plant Size (Electrical Capacity, MWe) |
|------------------------|--------------|---|---------------------------------------|
| DECON | PWR | 8000 - 10,000 (282,500 - 353,000) | 1130 to 1825 |
| | BWR | 2000 (71,000) | 240 |
| SAFSTOR | PWR | 600 - 45,000 (21,000 - 1.5 million) | 23 to 1437 |
| | BWR | 18,000 (636,000) | 660 |
| ENTOMB1 | Either | <5000 (<177,000) | Variable |
| ENTOMB2 | Either | <500 (<17,700) | Variable |

(a) Data were available from a limited number of facilities and based on actual estimates provided by the licensees.

4.3.18.4 Conclusions |

The staff has considered available information on the potential impacts of decommissioning on irreversible and irretrievable commitments of resources, including comments received on the draft of Supplement 1 of NUREG-0586. This information indicates that the impacts of decommissioning on irreversible and irretrievable commitments are neither detectable nor destabilizing. Therefore, the staff makes the generic conclusion that the impacts on irreversible and irretrievable commitments are SMALL. The staff has considered mitigation and concludes that no additional measures are likely to be sufficiently beneficial to be warranted.

4.4 References |

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10 CFR 51. Code of Federal Regulations. Title 10, *Energy*, Part 51, "Environmental protection regulations for domestic licensing and related regulatory functions." |

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I 14 CFR 150. Code of Federal Regulations, Title 14, *Aeronautic and Space*, Part 150, “Airport noise compatibility planning.”

24 CFR 51B. Code of Federal Regulations, Title 24, *Housing and Urban Development*, Part 51B, “Environmental criteria and standards.”

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29 CFR 1926. Code of Federal Regulations, Title 29, *Labor*, Part 1926, “Safety and health regulations for construction.”

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36 CFR 800. Code of Federal Regulations, Title 36, *Parks, Forests, and Public Property*, Part 800, “Protection of historic properties.”

40 CFR 50. Code of Federal Regulations, Title 40, *Protection of Environment*, Part 50, “National primary and secondary ambient air quality standards.”

I 40 CFR 51. Code of Federal Regulations, Title 40, *Protection of Environment*, Part 51, “Requirements for preparation, adoption, and submittal of implementation plans.”

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40 CFR 81. Code of Federal Regulations, Title 40, *Protection of Environment*, Part 81, “Designation of areas for air quality planning purposes.”

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49 CFR 171 - 177. Code of Federal Regulations, Title 49, *Transportation*, Parts 171-177, "General information, regulations, and definitions"; "Hazardous materials table, special provisions, hazardous materials, communications, emergency response information, and training requirements"; "Shippers--general requirements for shipments and packagings"; "Carriage by rail"; "Carriage by aircraft"; "Carriage by vessel"; "Carriage by public highway."

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4.5 Related Documents

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5.0 No-Action Decommissioning Alternative

The action discussed in this Supplement and in the *Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities* (1988 GEIS; NRC 1988) is decommissioning. The only alternative to the action of decommissioning is not to decommission the facility. The option to restart the reactor is not considered to be an alternative to decommissioning because the regulations do not allow the licensee to reload fuel and restart the facility after submitting a certification that the fuel has been removed from the reactor vessel.

The alternative to decommissioning at the end of the licensing period is a "no action" alternative, implying that a licensee would simply abandon or leave a facility after ceasing operations. Once the facility permanently ceases operation, if the licensee does not conduct decommissioning activities to an extent that meets the license termination criteria in 10 CFR 20 Subpart E, then the license will not be terminated (although the licensee will not be authorized to operate the reactor). The licensee will be required to comply with the necessary requirements for the operating license. As a result, the environmental impacts for maintaining the nuclear reactor facility will be considered to be in the bounds of the appropriate, previously issued Environmental Impact Statements.

The objective of decommissioning is to restore a radiologically contaminated facility to a condition such that there is no unreasonable risk from the decommissioned facility to the public health and safety. The U.S. Nuclear Regulatory Commission (NRC) regulations do not allow the option of not decommissioning. Under NRC regulations, the original operating license for a nuclear power plant is issued for up to 40 years. The license may be renewed for additional 20-year periods if NRC requirements are met. However, at the end of the term of the license (whether it has been extended or not), the regulations require that the facility be decommissioned.

5.1 Reference

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6.0 Summary of Findings and Conclusions

6.1 Summary of Findings

This chapter summarizes the findings and conclusions from the evaluation of environmental impacts related to decommissioning of permanently shutdown commercial nuclear power reactors. Table 6-1 presents each environmental issue that was evaluated and identifies whether the issue is considered generic or site-specific. Of the environmental issues assessed (see Table 6-1), most of the impacts are generic and SMALL for all plants regardless of the decommissioning activity and identified variables (see Appendix E for a list of the variables).

Two issues were identified that require a site-specific analysis: threatened and endangered species and environmental justice.

In accordance with the Endangered Species Act of 1973 (16 USC 1531 et seq.), the appropriate Federal agency (either the U.S. Fish and Wildlife Service or the National Marine Fisheries Service) must be consulted about the presence of threatened or endangered species. Informal consultation will be initiated by the U.S. Nuclear Regulatory Commission (NRC) staff with the appropriate service after the licensee announces permanent cessation of operations. It is expected that any formal or informal consultation will be completed prior to the licensee beginning major decommissioning activities, which can occur 90 days after the submission of the post-shutdown decommissioning activities report (PSDAR). At that time, it will be determined whether such species could be affected by decommissioning activities and whether formal consultation will be required to address the impacts. Each State should also be consulted about its own procedure for considering impacts to State-listed species.

Executive Order 12898 (59 FR 7629), dated February 16, 1994, directs Federal executive agencies to consider environmental justice under the National Environmental Policy Act of 1969 (NEPA). Although the NRC is an independent agency, the Commission has committed to undertake environmental justice reviews. Subsequent to the submittal of the PSDAR, the NRC staff will consider the impacts related to environmental justice from decommissioning activities.

Four issues were determined to be, depending on the circumstances, either generic or site-specific: land use, aquatic ecology, terrestrial ecology, and cultural and historic resources. Impacts resulting from onsite land use, impacts to aquatic and terrestrial resources resulting from activities occurring within the facility's operational areas, and impacts to cultural or historic resources resulting from activities within the facility operational area were determined to be generic and SMALL.

Findings and Conclusions

Table 6-1. Summary of the Environmental Impacts from Decommissioning Nuclear Power Facilities

| | Issue | Generic | Impact |
|---|--|-------------------|---------------|
| | Onsite/Offsite Land Use | | |
| | - Onsite land use activities | Yes | SMALL |
| I | - Offsite land use activities | No | Site-specific |
| | Water Use | Yes | SMALL |
| | Water Quality | | |
| | - Surface water | Yes | SMALL |
| | - Groundwater | Yes | SMALL |
| | Air Quality | Yes | SMALL |
| | Aquatic Ecology | | |
| I | - Activities within the operational area | Yes | SMALL |
| I | - Activities beyond the operational area | No | Site-specific |
| I | Terrestrial Ecology | | |
| I | - Activities within the operational area | Yes | SMALL |
| I | - Activities beyond the operational area | No | Site-specific |
| | Threatened and Endangered Species | No | Site-specific |
| | Radiological | | |
| | - Activities resulting in occupational dose to workers | Yes | SMALL |
| | - Activities resulting in dose to the public | Yes | SMALL |
| | Radiological Accidents | Yes | SMALL |
| I | Occupational Issues | Yes | SMALL |
| | Cost | NA ^(a) | NA |
| | Socioeconomic | Yes | SMALL |
| | Environmental Justice | No | Site-specific |
| I | Cultural and Historic Resource Impacts | | |
| I | - Activities within the operational areas | Yes | SMALL |
| I | - Activities beyond the operational areas | No | Site-specific |
| | Aesthetics | Yes | SMALL |
| | Noise | Yes | SMALL |
| | Transportation | Yes | SMALL |
| | Irretrievable Resources | Yes | SMALL |
| (a) A decommissioning cost assessment is not a specific National Environmental Policy Act (NEPA) requirement. However, an accurate decommissioning cost estimate is necessary for a safe and timely plant decommissioning. Therefore, this Supplement includes a decommissioning cost evaluation, but the cost is not evaluated using the environmental significance levels nor identified as a generic or site-specific issue. | | | |

Findings and Conclusions

Impacts resulting from offsite land use to support decommissioning activities, impacts to aquatic and terrestrial resources resulting from activities occurring outside the facility's operational areas, and impacts to cultural, historic or archeological resources resulting from activities beyond the operational areas cannot be evaluated generically and would require a site-specific analysis before undertaking the activity. These are termed conditionally site-specific.

Before a licensee conducts any decommissioning activity that might result in the disturbance of historic properties or archeological resources outside the site operational area, the NRC will, in accordance with the National Historic Preservation Act of 1966, as amended (16 USC 470 et seq.), consult with the appropriate State (or Tribal) Historic Preservation Officer to evaluate potential impacts.

The issue of cost was addressed in this Supplement but was not evaluated.

The staff also determined that the issue of long-term radiological aspects of Rubblization or onsite disposal of slightly contaminated material could not be evaluated generically and would require a site-specific analysis. The site-specific analysis would be conducted at the time the license termination plan (LTP) for the site is submitted.

For the 19 reactors listed in Table F-1 that have permanently ceased operation during the period 1963 through 1997, the staff has determined that no issue or activity must be re-evaluated immediately, provided that the licensee does not change the decommissioning option previously chosen. The NRC staff conducted a detailed environmental review on a number of these facilities prior to 1996 as part of the decommissioning plan review. Licensees for several of these reactors have submitted LTPs for NRC review and approval, and the staff has evaluated or is evaluating site-specific environmental impacts as part of that review. Therefore, for many of the 19 facilities, a site-specific assessment has been performed. Because decommissioning is substantially underway at all 19 reactors, the impacts for the issue of environmental justice have already occurred and an evaluation at the present time would provide little value and opportunity for mitigation. Impacts on threatened and endangered species are considered on an ongoing basis and the issuance of this Supplement would not accelerate a review of the issue solely because the issue is one that cannot be evaluated generically. The staff will continue to conduct site-specific consultations with the appropriate resource agency, as the need arises.

Therefore, the NRC has determined that it is not necessary at this time to conduct an evaluation of the environmental justice or impacts on threatened and endangered species at the 19 permanently shutdown reactors listed in Table F-1. However, should a licensee choose a different decommissioning option from its current choice (e.g., SAFSTOR rather than DECON),

Findings and Conclusions

- | then the site-specific issues would need to be considered prior to undertaking a decommissioning activity not previously evaluated.
- | For the 19 facilities listed in Table F-1 that have initiated decommissioning, as well as for any facilities that permanently cease operation in the future, any planned decommissioning activity would require a site-specific analysis prior to undertaking the proposed activity (see Section 1.5) if the activity:
 - | • results in an impact outside the range of impacts postulated by this Supplement or
 - | • raises environmental issues that were not considered in this Supplement or
 - | • involves an issue determined to be site specific or conditionally site-specific as described above in this Supplement or
 - | • involves a combination of the above.

6.2 Conclusions

- | A licensee undergoing or planning decommissioning of a nuclear reactor facility may use this Supplement in its evaluation of the environmental consequences from decommissioning activities. The impacts identified in this Supplement are designed to span the range of impacts for all commercial power reactor facilities that have permanently shut down as well as for the reactor facilities that are currently operating, including the facilities that have, or may, renew their operating license beyond the original 40-year license.
- | For those issues that have been determined to be generic, licensees may proceed with the decommissioning activity without further analysis provided that the impacts resulting from those activities fall within the range of impacts as described in Chapter 4. However, if the impacts of an activity fall outside the range predicted in Chapter 4, or if the activity results in impacts to environmental issues not considered in this Supplement, or if the impact involves an environmental issue determined to be conditionally site-specific as defined above, then the activity cannot be performed until a further site-specific analysis is completed along with a license-amendment request and NRC has approved the license amendment (the license-amendment request will provide an opportunity for a public hearing).

6.3 References

Endangered Species Act of 1973, as amended, 16 USC 1531 et seq.

Executive Order 12898. 1994. "Environmental Effects of Federal Programs on Minority and Low-Income Populations." 59 FR 7629, February 16, 1994.

National Environmental Policy Act (NEPA) of 1969, as amended, 42 USC 4321 et seq.

National Historic Preservation of 1966, as amended, 16 USC 470 et seq.