

**From:** Joel Dorfman  
**To:** Jennifer Golder  
**Date:** 5/1/01 4:29PM  
**Subject:** Notes on Pebble Bed Meeting

Attached are my notes from attending the last 1.5 hours of yesterday's meeting. The slides from Exelon and RES also have good information. The most important facts that I got from the meeting are as follows:

- The Commission paper went up last week (SECY01-0070).
- Exelon will be sending NRC 10 "White Papers" to get NRC reaction to various issues. One of the papers will address concerns with the annual fees required of licensed reactors.

**CC:** David Drucker; Glenda Jackson; Sandi Park

C/SJ

## Notes on RES Meeting with Exelon and DOE on Pebble Bed Modular Reactor (PBMR)

I attended the last 1.5 hours of the meeting, which focused on legal and financial issues, as well as future plans.

Exelon plans to issue "White Papers" on the following topics to NRC within the next couple of weeks. Exelon is looking for NRC comments in **June, 2001**.

- Antitrust. Exelon feels that "merchant" plants should be treated differently in NRC regulations regarding antitrust issues.
- Decommissioning Funding. Exelon will propose alternatives to traditional "sinking funds".
- Financial Qualifications. Need exemption for "merchant" plants, similar to public utility exemptions. Exelon will define "merchant plants".
- Price Anderson Act. Exelon is concerned that the cost of insurance will be high for a large number of small reactors. May require regulatory revisions.
- Emergency Planning. Issues exist if new reactors are placed at existing sites.
- Annual Fees. Licensees are currently charged \$3 million per reactor. Such a cost for a large number of small reactors would be excessive for Exelon. This will be a rulemaking issue. Although fees wouldn't be paid until licensed several years in the future, Exelon needs some feedback in June on how the agency might address this issue in order to develop a planning assumption. NRC will get a "White Paper" on this issue.
- Operator Staffing. Staffing could be lower at small reactors.
- Uranium Fuel Cycle. Could be some differences than the normal cycle. Could have foreign fuel?
- Number of Licenses. Can one license cover multiple reactors on a single site?

### NRC/RES/Tom King:

- Pre-application work could go into the middle of next calendar year.
- SECY 01-0070 went to Commission last week. Includes pre-application plan. Paper is flexible on the details.
- Exelon's schedule is consistent with RES's 18 month schedule.
- Exelon should consider giving ACRS an informational briefing.
- DOE's interest is on the generic side - impact on advanced reactors. Interested in fuel issues.
- Exelon is awaiting results from S. African work