

Nuclear Energy Industry Perspective on the Transition to Decommissioning

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Industry Priorities

- Focus resources on resolving issues for plants currently in transition
- Share decommissioning transition operating experience
- Initiate Rulemaking
- Develop interim industry guidance

Focus Resources on Plants in Transition

- Industry's top priority-100% resource commitment by decommissioning staff
- Expedite exemption and license amendment review and approval prior to dedicating resources to rulemaking
- Utilize “lessons learned’ to inform rulemaking

Shutdown Plant Transition

- Risk-informed exemptions and license amendments are currently necessary to transition from plant shutdown into decommissioning
- Previous and current experience support risk-informed improvements to the transition-related regulatory processes

Support Rulemaking

- Provides a stable and predictable regulatory environment
- Limit scope to decommissioning transition (includes transition from wet to dry storage)
- Regulatory requirements should be tiered, based on plant risk profile
- SECY 00-0145 is a good historical point of reference for rulemaking considerations
 - Identifies relevant transition issues and puts forth a risk-informed, tiered approach to the transition process
 - Industry recognizes that subsequent operating experience and technical work will need to be considered.

Develop Industry Interim Guidance

- Decommissioning transition issues are being addressed on a licensee-specific basis
- Corresponding industry and agency functional groups are interacting on the generic regulatory and technical aspects of the issues
- NEI plans to develop, with NRC engagement, interim industry guidance to serve until rulemaking is implemented
 - One goal of the guidance will be to maximize harmony between the EP change process and the rest of the regulatory framework, to the extent possible given the current regulations

Industry Areas of Focus

- Emergency Planning
- Security (including FFD, Fatigue Rule)
- Certified Fuel Handler Training Program
- Other Areas
- Timing for Rulemaking
 - As soon as can be accomplished, without impacting current plant reviews
 - Current estimate for completion of rulemaking is 4 years- marginally beneficial to Oyster Creek or other early plants
- Envelope Risk
 - Utilize tiered, risk-informed processes based on plant status

Conclusion

- Support for current plants is top priority-industry requests full staff support
- Rulemaking is essential for the remaining 100+ plants that will eventually enter decommissioning-industry's next priority
- Interim industry guidance developed in parallel to support unplanned decommissioning decisions
- Review of requests and priorities in industry areas of focus.

Emergency Preparedness

- Focus area
 - Current licensing actions
 - Generic guidance
- Regulatory
 - Codify exemptions
 - Initiating Conditions (IC) and Emergency Action Levels (EAL)
 - Emergency plan change process recognizes the operation of 10CFR 50.82.

Security Focus Areas

- Current licensing actions (Kewaunee exemption requests)
- Generic guidance
 - Interim staff guidance for transition/wet storage
 - Target set reduction, changes to vital areas, and number of responders consistent with risk profile
 - Adjustments to security posture and strategy
 - Interim staff guidance for ISFSIs
- Codify 73.55 to specify requirements for ISFSIs (e.g. 73.51?)

Certified Fuel Handler (CFH) Training Program

- Near Term:
 - Industry developed guideline for CFH Training Program content and administration
 - Target submittal for NRC review prior to end of first quarter 2015
- Longer Term:
 - Scope of requested rulemaking changes
 - 10CFR50.2, Definitions
 - 10CFR50.54, Conditions of Licenses
 - 10CFR50.120, Training and Qualification