

NRC-Decommissioning Task Force Meeting

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Nuclear Energy Institute

April 23, 2015-Rockville, MD



Common Objectives

- Timely and efficient review process that informs rulemaking
- Strong documented regulatory basis for positions
- Stable and predictable regulatory environment through rulemaking- “One NRC...One Industry”
- Rulemaking consistent with NRC Principles of Good Regulation

Agenda

- Introductions
- Industry Priorities
- Security
- Drug and Alcohol Programs
- Security Work Hours
- Aging Management
- Operations – Certified Fuel Handler Training
- Emergency Preparedness
- Exemption Process Feedback
- Industry Actions
- Rulemaking
- Key Industry Messages
- Closing Remarks
- List of Acronyms

Industry Priorities

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April 23, 2015-Rockville, MD



Industry Priorities

- Focus resources on resolving issues for plants currently in transition
 - Request NRC prioritize review of plant submittals over rulemaking
- Share decommissioning transition operating experience
- Inform 2019 Integrated Rulemaking – Industry intends to submit Petition

Security and Drug & Alcohol Programs

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Security

- Industry intends to submit an ISFSI Security Plan Template (NEI document) for NRC endorsement by the end of 2015
- NRC-endorsed NEI 11-08 currently provides guidance on submitting security plan changes
- Industry views current RAIs as inconsistent with NEI 11-08

Drug & Alcohol Programs

- All four decommissioning transition sites are maintaining existing operating plant programs to assure FFD
- Once fuel is removed from pool, corporate-administered industrial programs will be adequate to assure FFD and safety and are consistent with previously decommissioned sites
- Corporate-administered industrial programs contain elements of Part 26

Security Work Hours

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Security Work Hours

- Decommissioning plant personnel are no longer subject to 10 CFR 26 Subpart I
- Management of security work hours in an efficient manner should be addressed by guidance containing elements of Part 26
- To assure a consistent approach to comply with 10 CFR 73.55, NEI is developing guidance to be submitted for NRC endorsement by end of 2015

Aging Management

Phyllis Dixon

Duke Energy Crystal River 3
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Aging Management

- Decommissioning Plants have reduced risk and assure safety through existing plant programs that continue to be in effect after cessation of operations
- Regulatory uncertainty on this issue is delaying defueled Technical Specifications and fuel movements
- License renewal regulatory framework does not apply and is not necessary to assure safety at decommissioning plants

Operations – CFH Training

Phyllis Dixon

Duke Energy Crystal River 3

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Operations – CFH Training

- Draft document NEI 15-04 “Guidelines for Training and Qualification of Certified Fuel Handlers” is in industry review
- Revised target for submittal to NRC for endorsement review is third quarter 2015
- Draft document reflects results of previous public meetings with NRC and key considerations documented in recent safety evaluations

Emergency Preparedness

John Egdorf

Dominion Energy Kewaunee

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Emergency Preparedness

- Industry is working on three phase approach
 - Permanently Shutdown
 - Permanently Defueled
 - ISFSI Only
- Industry's Petition for Rulemaking will be informed by lessons learned and industry FAQs

Exemption Process Feedback and Industry Actions

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Exemption Process Feedback

- Dozens of submittals, each with multiple exemption requests for EP, Security and other areas have been made by the four sites in transition
- The exemption process is burdensome to both industry and NRC
- Rulemaking offers opportunity to streamline transition processes and reduce burden across the industry

Industry Actions

- Submit ISFSI Security Plan Template by end of 2015
- Submit work hours guidance by end of 2015
- Work with NRC to resolve aging management applicability issues
- Submit industry guidance for CFH Training and Qualification in Q3 2015
- Inform industry Petition for Rulemaking with exemption process lessons learned

Rulemaking

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Industry Petition for Rulemaking

- Seeking a stable and predictable regulatory environment
- Will be targeted in scope to assure efficiency of process for plants that will decommission in future
- Regulatory requirements should be tiered, based on plant risk profile
- Petition, to be submitted by the end of 2015, can serve as an industry roadmap going forward

Key Industry Messages

- Exemption and other reviews should be timely, efficient and inform future rulemaking
 - Approvals should be consistent with lower levels of risk in decommissioning
- Industry perceives that changes in NRC positions are being implemented through inspections and requests for information
 - Deviations from prior generic positions must be explained
- Rulemaking should be targeted to provide a stable and predictable regulatory environment
 - Focus should stay on the areas where exemptions and other regulatory relief has been sought, not on areas of the regulations where no adjustments have been needed

Closing Remarks

Pam Cowan and Mark Richter
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List of Acronyms

- CFH – Certified Fuel Handler
- CFR – Code of Federal Regulations
- EP – Emergency Preparedness
- FAQ – Frequently Asked Questions
- FFD – Fitness for Duty
- ISFSI – Independent Spent Fuel Storage Installation
- RAI – Request for Additional Information