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Regulatory Improvements for Decommissioning Power Reactors

Document: NRC-2015-0070-DRAFT-0022

Comment on FR Doc # 2015-29536

Submitter Information

Name: Gene Grecheck

Organization: American Nuclear Society

General Comment

See attached file(s)

Attachments

ps13

ANS Power Reactor Decomissioning letter

December 30, 2015

Secretary, U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

ATTN: Rulemakings and Adjudications Staff.

American Nuclear Society Comments on the Nuclear Regulatory Commission's (NRC's) Advance Notice of Proposed Rulemaking (ANPR) on Regulatory Improvements for Decommissioning Power Reactors (Docket ID NRC-2015-0070)

On behalf of the 11,000 men and women of the American Nuclear Society (ANS), we appreciate the opportunity to provide input in response to the ANPR on Regulatory Improvements for Decommissioning Power Reactors.

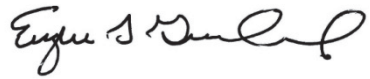
ANS recently added an updated position statement on the decommissioning of nuclear power reactors to the library of statements which reflect the Society's perspectives on nuclear science and technology issues of public interest. An excerpt from the position statement that is particularly relevant to the NRC ANPR is provided below.

However, clear [regulatory] guidance has not been fully developed for the time period between cessation of operation and completion of decommissioning. ANS supports the NRC's establishment of a consistent regulatory pathway for transition from rules applicable to an operating facility to those appropriate for a permanently shut down facility, rather than the current process of obtaining exemptions from operating plant regulatory requirements on a case-by-case basis.

In summary, ANS supports the NRC's proposal to revise the regulations for decommissioning nuclear power reactors and thereby clarify and streamline the process while continuing to protect the health and safety of the public. ANS submits the attached Position Statement "Decommissioning of Nuclear Power Reactors" (October 2015) as its formal comments in response to the Advance Notice of Proposed Rulemaking.

In closing, we are pleased to provide any additional information or comments as required.

Sincerely,

A handwritten signature in black ink, appearing to read "Eugene S. Grecheck". The signature is fluid and cursive, with the first name "Eugene" being the most prominent.

Eugene S. Grecheck
President, American Nuclear Society



Position Statement #13

Decommissioning of Nuclear Power Reactors

The American Nuclear Society (ANS) recognizes that decommissioning nuclear facilities at the end of their operational lives can be, and has been, performed safely while protecting the environment. The alternatives of prompt decommissioning or maintaining the facility in a safe storage condition while radioactive material decays can be, and have been, performed safely. ANS believes that the selection of the decommissioning alternative should be site-specific and should take into account facility and site characteristics, financial considerations, and even future site needs for power and land availability, among other factors.

The rules for decommissioning a nuclear power plant are set out in several Nuclear Regulatory Commission (NRC) regulations (10 CFR, Part 20 Subpart E, and Parts 50.75, 50.82, 51.53, and 51.95). There are established (NRC) regulations and regulatory guidance for terminating a nuclear reactor's license when decommissioning is complete (NUREG-1700, NUREG-1757). However, clear guidance has not been fully developed for the time period between cessation of operation and completion of decommissioning. ANS supports the NRC's establishment of a consistent regulatory pathway for transition from rules applicable to an operating facility to those appropriate for a permanently shut down facility, rather than the current process of obtaining exemptions from operating plant regulatory requirements on a case-by-case basis.

As an example, emergency planning requirements should be commensurate with the nature of the risk during the decommissioning period. Offsite emergency planning requirements, which apply to operating plants, are different than onsite emergency planning requirements for decommissioning facilities. After the fuel has been removed from the reactor and sufficient time has elapsed, the consequences of postulated accidents are not large enough to merit formal offsite emergency preparedness plan requirements. Onsite emergency planning actions, including those for industrial safety, are still appropriate during decommissioning.

Further, the option for reactor restart should be allowed after permanent shutdown if economics or the other factors change after shutdown but before decommissioning operations commence. Any reactor restart would necessarily be contingent upon a thorough regulatory review that finds the facility in good physical condition for operations and acceptance by the NRC that the reactor meets safety requirements.



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