



NUCLEAR ENERGY INSTITUTE

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U.S. Nuclear Regulatory Commission's 2018
Regulatory Information Conference
March 14, 2018

NEI Perspectives on Efficient Decommissioning

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Background

- On November 20, 2017, NRC issued the Regulatory Basis Document (RBD) for rulemaking proposing changes to decommissioning regulations.
- Stated objective in NRC's Advanced Notice of Proposed Rulemaking (ANPR) is “to implement appropriate regulatory changes that reduce the number of licensing actions needed during decommissioning.”

Explanation of
the main idea

Industry Position

- RBD provides sound foundation for regulatory improvements needed to meet NRC's stated objective, but leaves the door open to changes that could add unnecessary regulatory burden
 - Recommendations support replacement of licensing actions for shut down plants with new regulations enhancing efficiency and certainty for NRC and licensees
 - Some concerns with proposal
 - Additional opportunities

Industry Concerns

- Some RBD recommendations could impose burdensome new guidance or requirements not necessary to assure safety or reduce regulatory burden:
 - Post Shutdown Decommissioning Activities Report (PSDAR) and related Guidance
 - Physical Security

PSDAR – Environmental Impacts

- Modified language in 10 CFR 50.82(a)(4) to state that licensees must:
 - Evaluate the environmental impacts of planned decommissioning activities in the PSDAR
 - Evaluate if the impacts are bounded by previous federally issued environmental review documents

This is
an explanation of
the main idea

PSDAR – Community Advisory Board

- Address the creation of community advisory boards including details on frequency, makeup, and topics
 - No increase in public safety or efficiency
 - Community interaction is a site-specific consideration
 - Changes to PSDAR content should be driven by need to better inform the agency's regulatory decisions
 - No deficiencies noted by NRC in current guidance for PSDARs hindering regulatory decision-making

PSDAR – Spent Fuel Management

- Additional discussion in the PSDAR or Spent Fuel Management Plan to address
 - Management of spent fuel before dismantling systems for handling and shipping fuel.
 - Adds new burden to prepare and submit the PSDAR while not adding any safety benefit.

This is an
explanation of
the main idea

Physical Security

- NRC disposition of NEI comments on minimum number of armed responders diverges from the stated objective of rulemaking.
 - Final RBD proposes no changes to the inefficient process where licensees submit reassessment of the minimum number of armed responders although NRC recognizes the significant reduction in risk and targets
 - Allowing licensee reassessments to be documented in changes to security plans under 10 CFR 50.54(p) lessens the regulatory burden on staff and licensees and streamlines process for adjusting security requirements

Value Proposition

- Decommissioning Rulemaking that addresses inefficiencies without adding burden:
 - Saves 90+/- U.S. operating plants nearly \$1.5 billion
 - Reduces transition process time, now 12-18 months
 - Preserves decommissioning trust fund for radiological decommissioning
 - Reduces need to do it prematurely by doing it more efficiently!

Conclusion

- NEI strongly urges NRC to:
 - Complete rulemaking to improve the efficiency of the transition from operations to decommissioning as expeditiously as possible.
 - Utilize NEI response to the ANPR in developing the final rule language
 - Continue timely review of exemptions and license amendments until rulemaking is complete

Questions?