



Openness, Clarity, Independence: Stakeholder Engagement in CISF Licensing

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Topics

- Background of CISF Applications
- Guiding Principles for Stakeholder Interactions
- Summary of Stakeholder Engagement in CISF Reviews:
 - Environmental Review;
 - Safety Review;
 - Adjudicatory Hearing Process;
- Themes in CISF Stakeholder Interests and Concerns
- Conclusions

Interim Storage Partners, LLC (ISP) CISF – Andrews, Texas



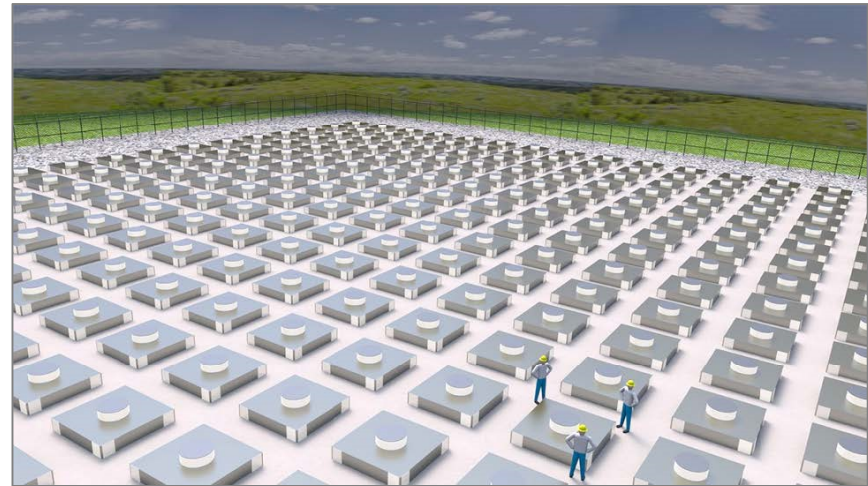
- License application submitted to NRC on April 28, 2016; temporarily suspended in April 2017, restarted in August 2018
- ISP, LLC as applicant; joint venture between WCS and Orano CIS LLC (a subsidiary of Orano USA), site located near the WCS LLW site in Andrews, TX
- Initial application for 40-year license to store 5,000 MTU of commercial spent fuel; future plans to expand to 40,000 MTU
- Proposed facility to use several different above-ground dry storage cask systems



Holtec HI-STORE CISF - Lea County, New Mexico



- License application submitted to NRC on March 30, 2017
- Holtec International is the applicant; proposed site in Lea County, New Mexico
- Initial application for 40-year license to store 8,680 MTU (500 canisters) of commercial spent fuel; future plans to expand up to 100,000 MTU
- Proposed facility to use the HI-STORM UMAX Canister Storage System



Guiding Principles for Stakeholder Interactions

- **Openness**

- ... by providing access to information;
- ... by communicating and interacting with the public;
- ... by providing opportunities to participate in our processes;

- **Clarity**

- ... by discussing our roles and responsibilities, our regulatory requirements, and the basis for our decisions;
- ... by providing accurate and timely information about our work;

- **Independence**

- ... in considering all facts, views, and relevant information before making our decisions;
- ... in following the highest standards for ethical performance and professionalism;

Stakeholder Engagement in NRC's Environmental Review



- NRC's NEPA process provides substantial opportunities for involvement and participation
 - Request from State Government participation as cooperating agency in NEPA review
- Substantial engagement and participation in CISF NEPA review:
 - High interest and attendance at scoping meetings
 - Variety of scoping meeting formats, open houses
 - Very large number of scoping comments submitted
 - In-person, written, electronic submissions via website, and via dedicated email address
- Use of multiple communication channels for information dissemination and to solicit feedback
 - NRC public website, local newspaper ads, CISF-specific email distribution lists (listserve), meetings with local government officials

Stakeholder Engagement in NRC's Safety Review



- Substantial participation and attendance in NRC public meetings with applicant
- Continued interest and multiple requests for NRC staff briefings to Federal, State and Local government officials

Stakeholder Engagement in Adjudicatory Hearing Process



- Hearing petitions submitted on both applications, including substantial number of contentions
- Significant interest and attendance at ASLB's pre-hearing conferences held near the proposed sites

Themes in CISF Stakeholder Interests and Concerns



- Several common concerns or issues identified in stakeholder interactions:
 - Questions about NRC's roles and responsibilities in national policy for management and disposal of spent nuclear fuel;
 - Questions about the regulatory framework for spent nuclear fuel transportation, including the different roles of Federal, State, and local government;
 - Concerns about spent nuclear fuel shipments, including risks from transportation accidents;
 - Concerns about the terms of CISF facility licenses, as it relates to lack of permanent disposal solution;
 - Concerns about effects to existing industrial and/or economic activities near the proposed CISF sites

Conclusions



- NRC values the views and concerns of external stakeholders in connection with CISF reviews, and will continue to engage and provide information about its review processes and decisions.
- Opportunities to further inform and clarify NRC's regulatory role in spent fuel transportation to CISF is important for increasing the public's understanding of NRC's safety and security mission.
- NRC staff welcomes our external stakeholders ideas and suggestions for improving the quality and responsiveness of its communication efforts.