



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

Dave Fauver
8/28/97

August 22, 1997

MEMORANDUM TO: John W. Hickey, Chief
Low-Level Waste and Decommissioning Projects Branch
Division of Waste Management
Office of Nuclear Material Safety and Safeguards

FROM: Marvin Mendonca, Acting Director *[Signature]*
Non-Power Reactors and Decommissioning
Project Directorate
Division of Reactor Program Management
Office of Nuclear Reactor Regulation

SUBJECT: SUPPORT FOR RESPONSE TO COMMISSION REGARDING DSI-24,
POWER REACTOR DECOMMISSIONING

We request your support in responding to the Staff Requirements Memorandum associated with DSI-24, Power Reactor Decommissioning (attached).

The attachment contains the subject requested scope of work. We request that you provide this information before October 10, 1997, so that NRR may adhere to the Commission's schedule. We appreciate your support in this matter. If you need any further clarification of this request, you may contact Singh Bajwa at 415-1013 or Tony Markley at 415-3165.

Attachments:

1. Scope of Work
2. SRM, dated April 3, 1997

cc: T. Johnson, NMSS

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PDR WASTE
WM-3 PDR

Office of Nuclear Material Safety and Safeguards

Scope of Work: SUPPORT FOR RESPONSE TO COMMISSION REGARDING DSI-24, POWER REACTOR DECOMMISSIONING

Requirement: The Commission requested the staff to "consider public comments received suggesting improvements in existing practices and rulemakings. These should include ... data available (e.g., survey costs) from recent decommissionings, and implementing radiological assessments coincident with licensee's efforts." The Commission also requested that the staff "consider innovative regulatory approaches to decommissioning.... Options that the staff should consider include: taking a performance-based approach by only performing a radiological assessment of the site when it is ready to be released ..."

Discussion: We understand that your staff has significant experience with this subject and would appreciate your input and perspective in responding to the Commission request.

Information Requested:

Provide an historical background discussion of the NMSS efforts to address the decommissioning and radiological release survey issues. Describe the nature of contracted efforts and efforts coordinated with other government agencies, laboratories, etc., to address these issues. Discuss documents produced and consensus achieved. Provide overview discussions of MARSSIM (NUREG-1575) and the nonparametric survey methodology discussed in draft NUREG-1505 and their applicability to decommissioning and radiological release surveys. Discuss views on the acceptability of these survey methodologies and provide an analysis of potential resource savings over current radiological release survey methods. Finally, discuss the time line for implementation of new survey methodologies.

Discuss any other initiatives and operational practices, with respect to decommissioning and radiological release surveys, that reduces the NRC and licensee resource burdens while providing an equivalent level of safety.

We appreciate your support and would also appreciate any thoughts, ideas, or innovative approaches that you may have for improving the decommissioning regulatory program.



SECRETARY

UNITED STATES
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April 3, 1997

MEMORANDUM TO: L. Joseph Callan
Executive Director for Operations

FROM: John C. Hoyle, Secretary

SUBJECT: STAFF REQUIREMENTS - COMSECY-96-068 -
STRATEGIC ASSESSMENT ISSUE PAPER:
DECOMMISSIONING - POWER REACTORS (DSI 24)

The Commission supports achieving finality in decommissioning requirements as soon as practicable. As the industry moves to a deregulated environment, decommissioning implementation costs must be understood and properly factored into planning decisions and/or rate recovery mechanisms. To this end, the Commission approves Option 2, pursue current direction and approaches more aggressively, for Decommissioning - Power Reactors (DSI 24) as the Final Commission View subject to the following comments.

The staff should address the issue of financial assurance for decommissioning. The staff should also address the issue of site specific decommissioning cost estimates by providing a rulemaking plan for Commission consideration.

(EDO)

(SECY Suspense: 4/30/97)

The staff should accelerate resolution of decommissioning rulemaking issues and consider the option of combining several rulemakings into a single rulemaking, or a few integrated rulemakings, if practicable. Risk-informed performance-based approaches to these rulemakings should be used only to the extent that the staff is ready to proceed with such an approach now.

The Commission is currently considering the issues of the radiological criteria for decommissioning in SECY-97-046 and the interim storage of greater-than-class-C waste in SECY-97-056.

The staff should consider the public comments received suggesting improvements in existing practices and rulemakings. These should include lessons-learned (e.g. packaging and transport), data available (e.g., survey costs) from recent decommissionings, and implementing radiological assessments coincident with the licensee's efforts.

To the extent that it does not compromise public health and safety, or delay the staff's completion of accelerated

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Attachment 2

rulemaking, the staff should consider innovative regulatory approaches to decommissioning. Particular approaches to consider are those which can accelerate decommissioning in a safe manner, but with appropriate NRC oversight at critical stages in the process. Options the staff should consider include: taking a performance-based approach by only performing a radiological assessment of the site when it is ready to be released; placing an inspector onsite during specific phases of decommissioning (e.g. during active dismantlement); and, centralizing reactor decommissioning inspection programs in headquarters.

(EDO)

(SECY Suspense: 12/31/97)

The staff should provide the Commission with an analysis of whether or not the staff views entombment as a viable decommissioning option and how this option has been dealt with previously by the Commission. If the staff concludes that it is not a viable option, the staff should describe the technical requirements and regulatory actions which would be necessary for entombment to be a viable decommissioning option. The staff analysis should include the resources involved, potential decommissioning cost savings, and vulnerabilities.

(EDO)

(SECY Suspense: 9/2/97)

cc: Chairman Jackson
Commissioner Rogers
Commissioner Dicus
Commissioner McGaffigan
Commissioner Diaz
K. Cyr (OGC)
D. Rathbun (OCA)
H. Bell (OIG)
A. Galante (CIO)
R. Scroggins (CFO)