

# License Termination Strategies

Decommissioning Strategy Forum

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# Successful License Terminations

- Licensees have strong Operational Health Physics and Quality Assurance Programs that transfer into the Final Status Survey Program
  - Manage data as it is collected and ensure consistency
  - Have strong Corrective Action Programs
  - FSS employs a Quality Assurance Survey Program to verify field performance
- Have strong licensing programs
  - Communicate often with NRC before submittals
  - Ensure submittals are accurate and of high quality
- Effectively use the 10 CFR 50.75(g) files, even in decommissioning, to ensure compliance at the end of the project
- Effectively use lessons learned, manage consultants, and contractors
- Communicate with the local community and elected officials

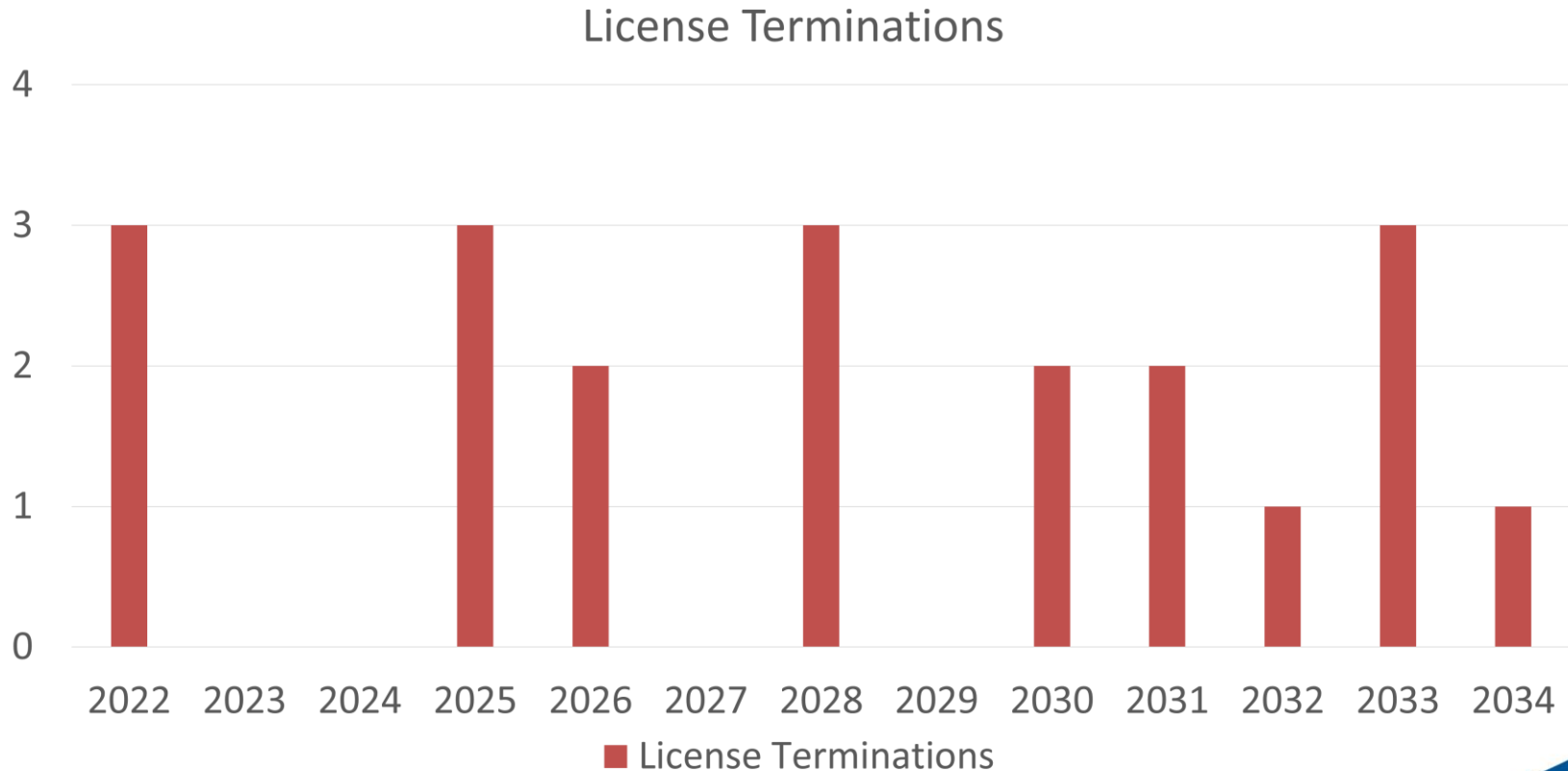
# Lessons Learned

- The License Termination Plan or Decommissioning Plan replaces the Safety Analysis Report and is incorporated into the license by amendment. Compliance is required.
- The licensee management is responsible for licensee performance and compliance. Challenges that impact the NRC's reviews include:
  - Quality of the submittals
  - Overly complicated dose modeling
  - Over classification of survey units
  - Not delisting of radionuclides
  - Complex survey procedures
  - Excessive information in Final Status Survey Reports
- Licensees cannot delegate compliance to a contractor.

# Moving Forward

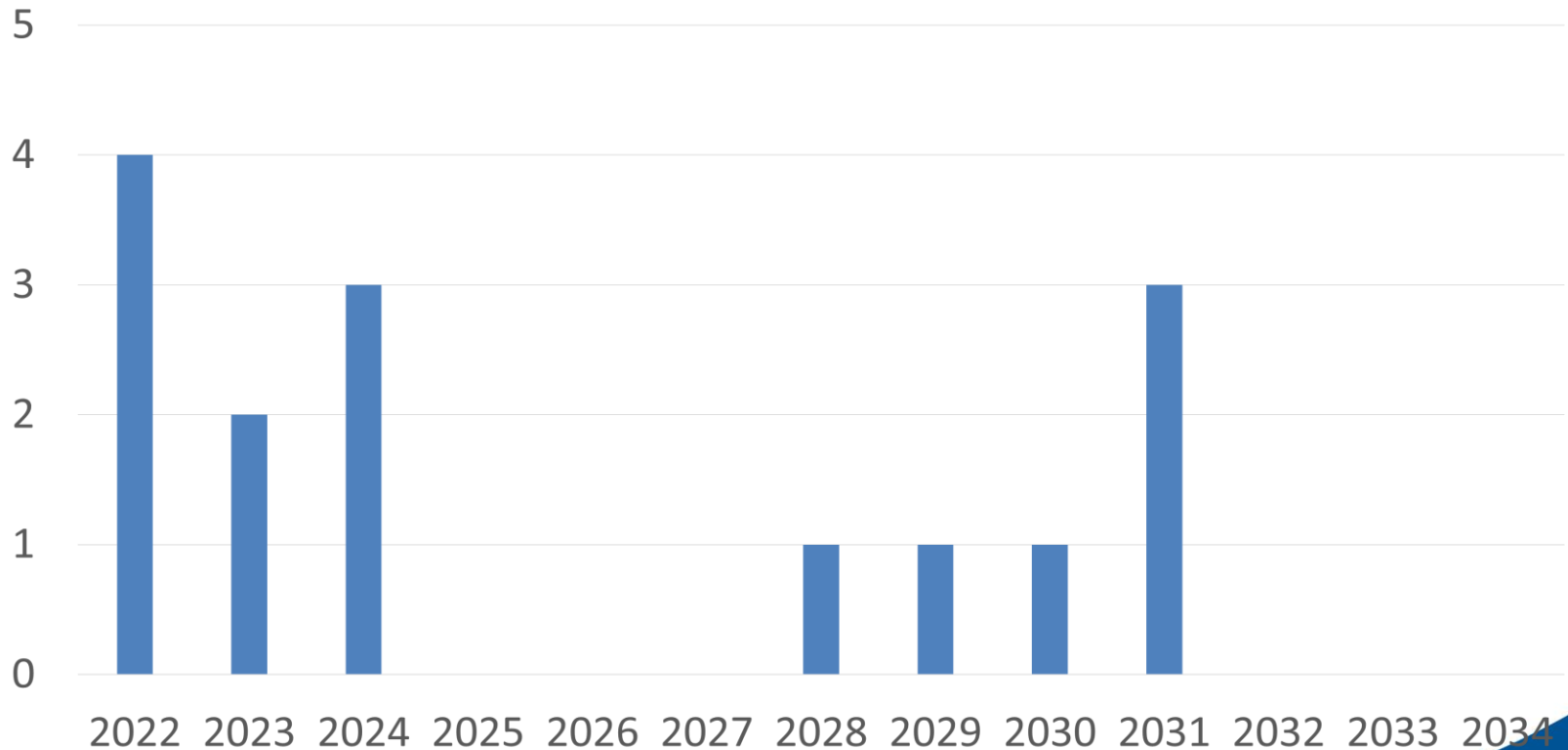
- NRC and Federal Partners with input from industry have provided extensive decommissioning guidance and tools as the roadmap to success, continuous improvement is welcomed.
- New approaches, deviations need technical justification, and the 2.206 petitions process is there for specific rule changes.
- NRC has initiated research to develop guidance on Discrete Radioactive Particles to ensure Commission policy and regulatory framework is followed.
- NRC has initiated work to develop sub-surface guidance and recently held a 2<sup>nd</sup> public workshop.
- NRC is your regulator—communicate often and do not assume your schedule will be ours.

# Projected License Terminations



# Moving LTP Schedules

License Termination Plans





*N. S. Savannah – License termination by 2031*

Thank you and look forward to your comments  
and questions!