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Regulatory Improvements for Production and Utilization Facilities Transitioning to Decommissioning

Comment On: NRC-2015-0070-0229

Regulatory Improvements for Production and Utilization Facilities Transitioning to Decommissioning

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Submitter Information

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General Comment

Regulatory Analysis - Alternative DA-2 (Rulemaking to Require Fitness for Duty program elements that support IMP for power reactors)

The NRC provided almost no information to support the basis for the significant estimated savings resulting from the rulemaking option (\$7M & \$14M depending on the NPV). So it's not possible to evaluate if the estimate is credible, accurate, and reflective of current operations. The only information presented on the change from operating to decommissioning sites is a reduction in staffing levels — page 32 of the analysis.

“NRC assumes that the staffing level at a nuclear power plant in the beginning of decommissioning is 25% of the full staffing level when fully operating. This is based on the fact that the decommissioning Vermont Yankee nuclear power plant has had 150 workers at the start of decommissioning (Ref. 27).” The Vermont Yankee data is from a Northstar decommissioning slide presentation from January 2017. The report states “150 FTEs as the current staffing level.” An FTE is not an actual staffing number, it's a labor hour estimate so it's not equivalent to the number of actual individuals subject to an FFD program (if all were full time workers then it would be 150 people, but that seems highly improbable). This estimate is also from for one year. Do staffing levels fluctuate by year of decommissioning activity? Northstar has not been decommissioning most of the plants and this is flaw. At a minimum, Holtec plants need to be included in the analysis and the timelines for movement of fuel from the spent fuel to dry storage must be included. Figure 15 on page 79 is a tornado chart on the uncertainty of various elements in the FFD program analysis for the rulemaking option. It clearly shows the “number of years to transfer all spent fuel to ISFSI” as the most significant cost driver with the largest uncertainty, range \$3.5M to \$9.6M.

Why is this important? See Holtec press release from December 2021 (<https://holtecinternational.com/2021/12/16/a-new-world-record-for-rapid-transfer-of-all-fissile-material-from-a-decommissioning-plants-spent-fuel-pool-is-set-at-pilgrim/>) titled “A new world record for rapid transfer of all fissile material from a decommissioning plant's spent fuel pool is set at Pilgrim.” This press release reports “The refueling of the plant, conducted with seamless safety and below the allotted crew

dose, was completed 2 1/2 years (30 months) after Pilgrim's permanent shutdown on May 31, 2019." This press release also conveys "This new record set by Holtec's Site Services team at Pilgrim improved upon a similar record-breaking refueling of one of Holtec's other shut down plants, Oyster Creek in New Jersey, during the summer of this year." The shorter the time a plant has fuel in the spent fuel pool, the lower overall costs for the FFD program and the reduction in the estimated savings from the proposed rule changes. So if you want to pump up the savings of the rule, you estimate long time periods to move the fuel to dry storage. Once all the fuel is in dry storage, the FFD program goes away.

Back to the staffing assumptions on page 32. It says "Whereas the Ginna nuclear power plant has had a peak staff level of 600 workers (Ref. 28)" Reference 28 is a September 1993 report titled "Aging Nuclear Power Plants: Managing Plant Life and Decommissioning." That 600 worker number for Ginna is from 1990 (that's 32 years ago - a poor indicator of current plant operations). This is not current information and this is not acceptable. NRC collects FFD data from every power plant each year.

While sites may not provide it in decommissioning, the NRC has received data from some decommissioning sites. For example, Kewaunee and San Onofre stopped operating in 2013 and still sent in data. None of this data is in the NRC analysis. This has to be corrected.