

Enclosure 1

Decommissioning, Uranium Recovery and Waste Programs (DUWP) Operating Experience Report FY2022

1. Introduction

The objective of the DUWP Operating Experience (OpE) report is to provide an analysis to identify trends in operational data and to make recommendations to improve our regulatory programs.

By systematically reviewing operational data and assessing its significance, the NRC is aiming to provide insights that can inform future inspections and licensing reviews, provide timely and effective communication to stakeholders, and apply the lessons learned to regulatory decisions and programs.

The scope of the assessment is the 2022 fiscal year and trends from previous years.

2. Data Assessment

Reported Events

Events are reported under Title 10 of the *Code of Federal Regulations* (10 CFR) Part 20 and the required reports based on the license requirements and specific regulations for the site.

No violations, reportable or non-reportable events were reported relevant to safety and security for the complex material decommissioning or uranium recovery sites. Based on courtesy reports, required events reports, and inspection findings, several issues have been identified in the reactor decommissioning area and are discussed below.

Part 21 Reports

No Part 21 reports were received pertaining to the business line.

Enforcement

During the past few year(s), there have been repetitive fire events reported at reactor decommissioning sites. Enclosure 2 provides a summary table of several fire protection inspection issues resulting in documentation of events and enforcement actions issued at a San Onofre, Fort Calhoun and Crystal River decommissioning reactor sites. In addition, the licensees made non-reportable courtesy notifications for several additional fire events at their sites.

One Confirmatory Order (EN 22-001) (ML22020A293) Notification of Significant Enforcement (EA 21-041) was issued by Region 1 pertaining to Holtec Decommissioning International - Oyster Creek security issue.

3. Trending and Review

Fire Protection at Decommissioning Power Reactors

To inform licensees of fire protection performance issues, the staff will be issuing INFO Notice in early FY23 based on the recent trends in fire events and notices of violation at decommissioning reactors.

Industrial Safety at Decommissioning Power Plants

DUWP staff is developing an INFO Notice/Generic Communication concerning an industrial safety fatality and numerous near-miss events at decommissioning reactors. These events include the fatality at Three Mile Island Unit 1 where a non-radioactive heavy load was being off loaded from a truck, the load fell on the individual resulting in his death. In addition, in FY21 and FY22, there have been numerous near-miss courtesy reports provided by licensees; 3 near-miss industrial safety events at San Onofre, 1 at Vermont Yankee, 1 at Oyster Creek, 2 at Zion, and 2 rigging issues resulting in a loss of load at Fort Calhoun and San Onofre.

Generic Issues

Quality of Information in the Licensee 10 CFR 50.75(g) files important to decommissioning.

With the recent increased number of power reactor permanent shutdowns and those in active decommissioning, the staff has been reviewing licensee records and have identified inconsistencies in the licensee's 10 CFR 75(g) files, information important to decommissioning. Staff has also identified that licensees in active decommissioning are not including events that occur during decommissioning operations that are important to completing the decommissioning to the 10 CFR 50.75(g) files. Staff is considering issuing a Generic Communication to clarify the 10 CFR 50.75(g) file content and retention requirements.

4. Conclusions

Based on the analysis above, the review group concludes that:

1. An Information Notice is being finalized to address Fire Protection issues at decommissioning reactors.
2. An Information Notice is being considered for alerting licensees to the recent industrial safety fatality and near-miss events.
3. A Generic Communication on the licensee's quality and use of the 10 CFR 50.75 (g) files, important information for decommissioning, is being considered.

5. Recommendations

NMSS DUWP requests the OpE Review Group provide the following recommendations:

1. Support issuing the Info Notice on Fire Protection at Decommissioning Reactors
2. Support issuing an Info Notice on Industrial Safety at Decommissioning Reactors
3. Support the development of a generic communication to clarify the requirements for the contents of 10 CFR 50.75(g) files.