

Decommissioning Plant Coalition Views Regarding Consolidated Interim Storage

**NRC Division of Spent Fuel Management
Regulatory Conference
November 19, 2015**

Background on the DPC

- Formed in 2001
- Original members: Maine Yankee, Yankee Rowe, Connecticut Yankee, LaCrosse, and Rancho Seco.
- Additional members: Humboldt Bay, Exelon (Zion), San Onofre, and Vermont Yankee. Big Rock Point has been a participant.
- Maintains contact with all permanently shutdown plants and with the Nuclear Energy Institute, NRC, National Association of Regulatory Utility Commissioners, and Nuclear Waste Strategy Coalition

Reason for the DPC

- Nuclear plants undergoing decommissioning and decontamination face different issues than operating reactors
- Recognition that, given the sharply reduced risk once operations cease, the attention and priority of industry and policymakers would be occupied with operating reactor matters
- Speaking together with one voice would enable those of us undergoing decommissioning to better advance our aims

Our Chief Aims

- Accelerate commencement of federal government's removal of spent fuel from our sites pursuant to its contractual obligations
- Secure a pilot project for Consolidated Interim Storage (CIS) for spent fuel from permanently shutdown sites
- Continue progress toward a repository at Yucca Mountain
- Ensure NRC regulation of our sites is based on solid assessment of risk

Support for CIS Pilot Project*

- DPC has supported a Consolidated Interim Storage pilot project since 2001
- Pilot project is consistent with findings of Blue Ribbon Commission
- Responsibly addressing the permanently shut-down sites is a fiscal and management imperative
 - Could reduce government's liability for breach of contract
 - Reduces need for local resources for oversight
 - Returns land to productive use more quickly
- CIS pilot project should move forward independently of Yucca Mountain

**It is not the DPC's intent to change existing DOE spent fuel acceptance queue order used for purposes of spent fuel damages calculations*

Support for Yucca Mountain

- A permanent repository is needed
- DPC supports repository at Yucca Mountain
- “the DPC urges you to include ...provisions that would support the continuation of Yucca Mountain licensing....”

– *from testimony of Einar Ronningen (Rancho Seco) on behalf of DPC at May 15, 2015, House Energy & Commerce Subcommittee Hearing, chaired by Congressman John Shimkus (R-IL)*

DPC/NRC Interactions

- Recognizing the impacts that NRC regulatory changes would have on our facilities as on-site storage continued, DPC established an engaged working relationship with the NRC.
- Encouraging greater attention to determining if proposed rule or regulatory changes *should* apply to our facilities before release.
- Comments on Project AIM:
 - Focus upcoming Decommissioning rulemaking on codifying exemptions that are customarily granted.
 - Ensure NRC Storage & Transportation and Decommissioning functions remain sufficiently staffed as those workloads are and will be increasing.
 - Regulatory changes only when based on solid assessment of risk.