

NRC Commission Meeting

July 15, 2014



**“LESSONS LEARNED FROM PRIOR
DECOMMISSIONING AND CURRENTLY
DECOMMISSIONED PLANT ISSUES”**

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Maine Yankee

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Connecticut Yankee

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Yankee Rowe

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Lessons Learned

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Success Requires:

- Clear Vision: “Begin with the End in Mind”
- Stakeholder Acceptance
- Regulatory Alignment
- Effective Management of Risk and Change
- Strong Project Management and Ops Transition
- Effective management of Safety, ALARA, Compliance, Cost and Schedule

Vision

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- Clearly define End State and Project Goals
- DECON or SAFSTOR?
- License Termination “pre” or “post” demolition?
- “Unrestricted release” for Radiological and Chemical contaminants; i.e. RCRA and Radiological closure?
- Used Fuel Storage strategy and approach?
- If you don't know where your going the path is rarely clear!

Stakeholder Engagement

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- Stakeholder engagement needs to occur early and often (Reg. Agencies; Community; Public; Workers; Shareholders, etc.)
- Get early alignment and acceptance of Vision
- Stakeholder buy-in is a continuous process
- Create a community outreach process inclusive of an advisory panel (CAP)
- Include regulators in the outreach process to support public confidence (NRC, EPA, State, etc.)
- Make sure you don't overlook the Workforce while engaging everyone else!!

Regulatory Alignment

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- Engage Regulators early in the process
- Gain alignment on “End State” and approach with all regulators as soon as possible.
- There are multiple regulators involved and the criteria for performance and end-state achievement are not always clear or consistent.
- RCRA closure (Chem. Remediation) is as challenging as License Termination (Rad. Remediation).
- Clarity and reliability in regulatory process is key to project success.
- Regulatory alignment with Plan and approach is fundamental to stakeholder confidence.

Management of Risk and Change

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- Risks change immediately and throughout project.
- Regulatory requirements should necessarily change with risk to support decommissioning efficiency.
- Due to nature of the work, “unknowns” are often encountered and contingency planning is key to success.
- Work scope and process is foreign to utility workforce at large and it can create an environment of uncertainty and unease (H/R and SCWE management a priority).
- Lessons learned from prior decommissioning can help inform Licensee and Regulators to support management of risk and change.

Strong Project Team

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- Utility must establish a strong “Project Management” team while maintaining priority on safety and nuclear principles during transition.
- Retain personnel in key functional areas and recruit proven talent for new roles and areas of weakness
- Contractor utilization in performance of the work is a necessary and logical strategy, but Licensee needs to be prepared “just in case”!
- Independent oversight is important ingredient for continuous improvement and lessons learned (e.g. IMAC at the Yankee Projects)

Serving Many Interests

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- You can achieve schedule and cost goals while achieving a high level of health, safety and compliance!!
- Multiple regulatory agencies have a “piece of the pie”, but licensee is obligated to all stakeholder groups.
- Safety is always highest priority, but can't ignore cost and schedule obligations.
- Success has been proven!!

ISFSI Site Issues

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- Ultimate Used Fuel and HLW disposition (Waste Confidence)
- Canister relicensing activities and process (NEI 14-03)
- Potential changes to ISFSI Security requirements (DG 5033); Changes need to be risk informed and credible.