



Transition to Decommissioning Kewaunee Experience

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Kewaunee Power Station

- Two-Loop PWR
- Shutdown announced October 2012
- Permanent shutdown May 07, 2013
- Permanently defueled May 14, 2013
- Spent fuel to ISFSI December 2016
- Plant not in rate base
- Decommissioning Trust Fund is fully funded



State of Decommissioning Regulation

- Details of transition process largely undefined.
- Continued applicability of operations-oriented regulations is incongruous.
- Use of “dated” precedence problematic.
- Unnecessary regulatory burden to NRC Staff, Licensee, and Trust Fund.
- Need risk-informed regulatory framework for transition to decommissioning.

Kewaunee Experience

Regulations often do not clearly address decommissioning. Therefore, large numbers of exemption requests are necessary.

- Exemptions requested from > 60 EP regulations in §50.47 and Appendix E.
- Expect similar exemption requests from Security Regulations in §73.55.
- Use Trust Fund for spent fuel management, reduce minimum insurance coverage limits.



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A well defined regulatory framework for plants in decommissioning would reduce or eliminate the need for exemption requests.



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Confusion regarding applicability of certain regulations:

- ERDS deactivation (Part 50, App. E)
- Cyber Security Rule applicability (§73.54)
- Mitigation Strategies Rule applicability (§50.54(hh)(3))
- EP change process (§50.54(q) as it relates to §50.82 certification)



Kewaunee Experience

Precedence from past decommissioning plants has been of limited value.

- Operator Licenses \$50.54(m)
- Certified Fuel Handler Training Program



Kewaunee Experience

- Limited guidance and minimal recent precedence result in longer preparation and review time (for Licensee and NRC Staff) on LARs, EP and Security exemption requests.
- Significant interface, including travel, for NRC Staff and Licensee.
- Both Licensee and NRC Staff are on a learning curve.

Conclusions

- All nuclear facilities will eventually be decommissioned.
- The current regulatory processes for decommissioning are not well defined and burdensome to the NRC staff and licensees.
- Recommend integrated regulatory framework and guidance be developed based on reduced risk using previous rulemaking efforts as a starting point.



Acronyms

- EP – Emergency Preparedness
- ERDS – Emergency Response Data System
- ISFSI - Independent Spent Fuel Storage Installation
- LARs – License Amendment Requests
- NRC – Nuclear Regulatory Commission
- PWR – Pressurized Water Reactor