

# NRC's Rulemaking Effort on Power Reactor Decommissioning

*Industry perspective*

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# Decommissioning Landscape

- NRC has a proven regulatory framework for decommissioning activities
  - Regulations for Permanent Defueling, SAFSTOR, Radiological Decommissioning, & Spent Management are well established
- 10 plants have safely completed decommissioning
- 18 plants are in the process of decommissioning
  - 5 plants\* most recently shutdown face a regulatory environment that has evolved significantly since 2000
  - Recently shutdown plants have higher dependence on licensing actions (amendments/exemptions) during transition
- 3 plants\*\* have announced near term shutdown

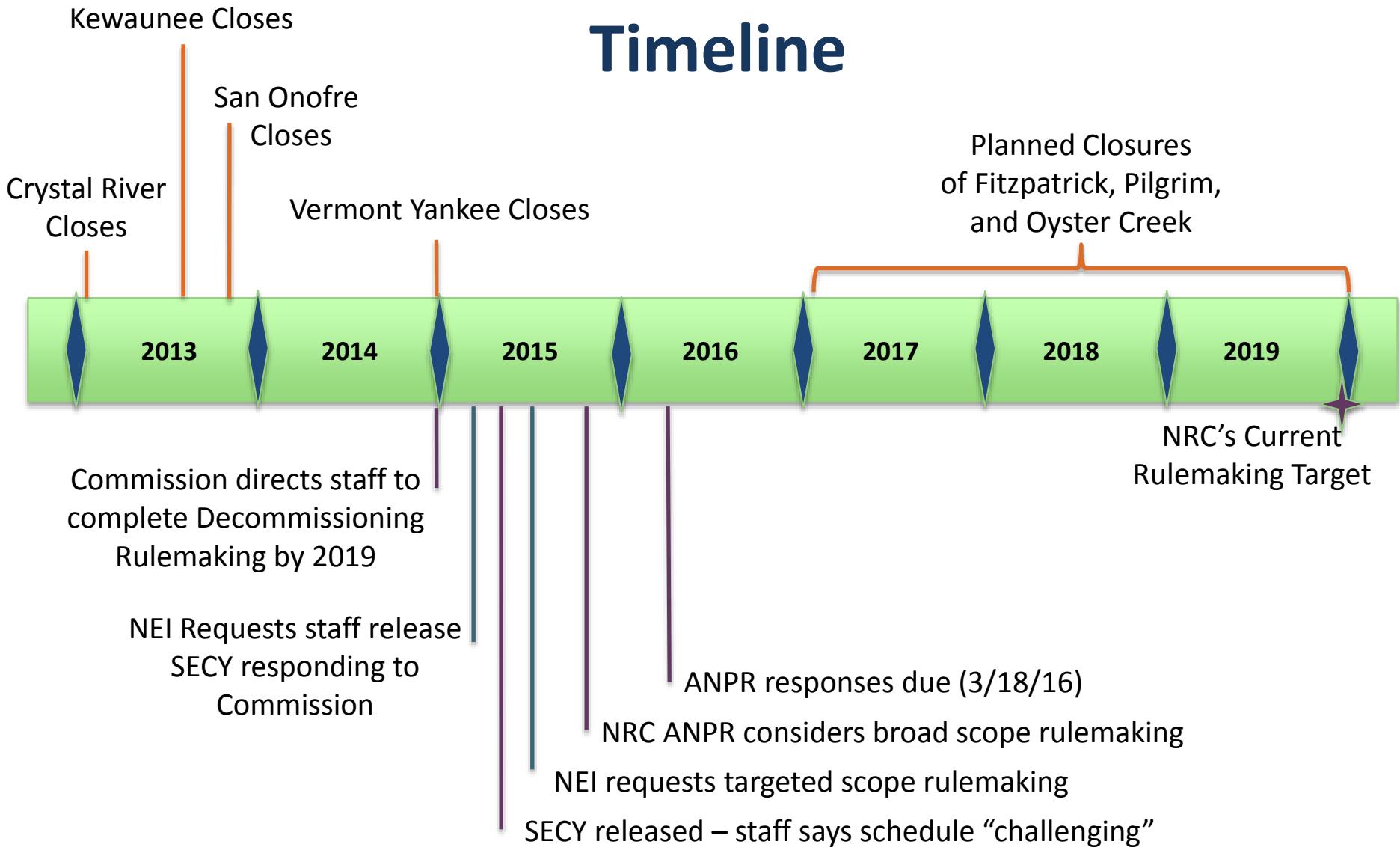
# Decommissioning Transition

- Licensing Actions (exemptions and/or license amendments) are required at the following points:

Transition Points	What is Transitioning
Permanently Defueled	Emergency Preparedness (EP), Security, Work Hours, Staffing/Training, Use of Trust Fund for Spent Fuel Expenses
Permanently Defueled – with qualifying SFP analysis	EP, Insurance
All Fuel in Dry Storage	EP, Security, Staffing/Training, Foreign Ownership
All Fuel Removed from Site	EP, Security

- Licensing Actions make for an inefficient transition
  - 12-18 months to complete (>\$1.5M effort) while unnecessary compliance costs of >\$1M/month are incurred

# Timeline



# Industry Recommendation

- Industry recommends that NRC pursue a limited scope rulemaking to address only the current transition inefficiencies
- Industry believes that NRC already has a regulatory basis for a limited scope rule
- NRC should be able to complete a limited scope rulemaking in a more timely manner
- Industry will submit a detailed rulemaking proposal

# Decommissioning Rulemaking Today

*NRC's Advanced Notice of Proposed Rulemaking\**

- “the need for a power reactor decommissioning rulemaking is not based on any identified safety-driven or security driven concerns.”
- “the primary objective of the decommissioning rulemaking is to implement appropriate regulatory changes that reduce the number of licensing actions needed during decommissioning”

\*80 Fed. Reg. 72,361, November 19, 2015

nuclear. clean air energy.

# Conclusion

- Any decommissioning rule must be carefully evaluated in the overall context in which today's nuclear industry exists
  - Must be consistent with the objectives of Project AIM
- Accordingly, industry recommends that NRC proceed with limited scope rulemaking limited to only changes that comport with the primary objective stated in the ANPR