



Decommissioning What's At Stake?

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Safe, Timely, Efficient Decommissioning Essential for:

- Public Confidence
- Ratepayer and Shareholder Value

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Safe, Timely, Efficient Decommissioning

- What's Needed?
 - Certified Spent Fuel Casks
 - Efficient License Termination Process
 - Risk Informed Regulations



Spent Fuel Management

- Historical Perspective
 - NRC rules of engagement
 - Cask certification time line reduced
 - ◆ 3-4 years down to about 20 months
 - Scope of certifications are limited!

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Spent Fuel Management

- Impact of Limited Certification
 - Decommissioning plants can't decommission their pools
 - Operating plants can't unload fuel
 - Band-Aids proposed are:
 - ◆ Impractical
 - ◆ VERY costly, i.e., in excess of \$10 Billion

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Limited Scope of Certification

■ Recommendations

- PRA would demonstrate extremely low risk
- PRA results support more timely, realistic Internal Staff Guidance

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Spent Fuel Management

- Inefficient Cask Listing/Amendment Process
 - Rulemaking to list takes too long
 - Amendment by rulemaking is a resource nightmare



Inefficient Cask Listing/Amendments

■ Recommendations

- Cut time to process internally
 - ◆ NRC review indicates several months can be eliminated from schedules
 - ◆ NRC PRs for fabrication at risk, final rule withdraw 30-day fabrication hold



Inefficient Cask Amendment Process

- Recommendations
 - Include process and criteria for amendments in initial listing rule
 - Smarter Certificates
 - Resolve generic issues!!

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Efficient License Termination

■ Recommendations

- Test needed for level of detail supporting LTP
- Dual regulation needs legislative fix
- Industry supports NRC initiative on material release
- Novel issues should go to Commission

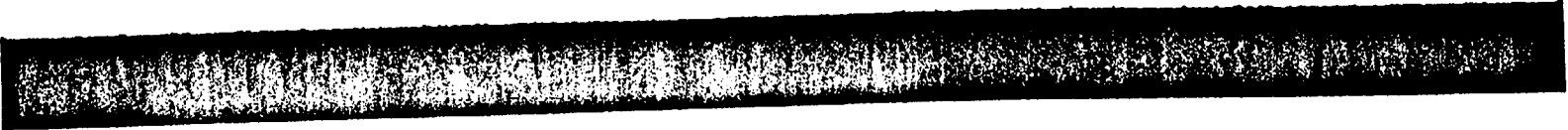
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Risk Informing Decommissioning Regulations

Mike Meisner, President of
MYAPC

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Risk Informed Regulations

■ Overview

- Commission directed staff to integrate and risk inform certain regulations
- Staff produced good model in short time frame
- Conservatism and worst case estimates skewed risk profile and risk insights

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Risk Informing D&D Regs

- Conservatism Added:
 - Human reliability
 - Heavy loads (used upper bound from previous analysis)
 - Consistent bias toward upper bound (Diesel pump reliability used .18 vs. .044 ALWR)



Fuel Uncovery Endpoint

- Not related to public risk
- Postulated runaway oxidation correlates with risk to public
- Realistic heatup and endpoint adds 3 days to recovery time! (8 days Vs. 5)

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Implications for Operating Plants

- Inconsistent with Commission Policy
and IPEs

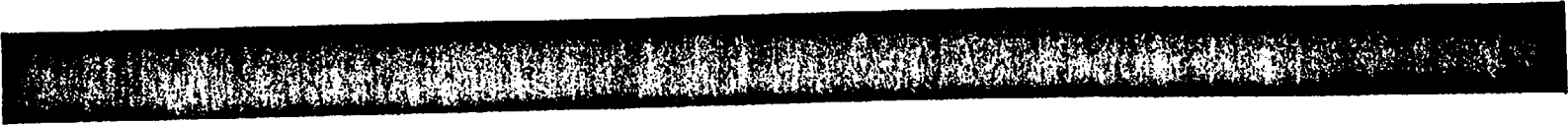
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Recommendations

- Credit industry commitments
- Revise study to:
 - Use best estimates
 - Remove conservatisms
- Truncate sequences beyond 2 days
- Requantify Model

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Benefits of Corrected Study

- Valuable risk insights
- Tool to focuses resources on risk
- Demonstration of margin and defense in depth
- Basis to avoid unnecessary resources for EP, insurance and security
- Avoids Carryover of erroneous risk insights to operating plants IPEs

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