

Improving Decommissioning Regulations

*Paul M. Blanch
Energy Consultant*

NRC Commission Presentation
November 6, 1999

NRC's Key Messages

1. Maintain safety
2. Enhance public confidence
3. Improve effectiveness and efficiency
4. Reduce unnecessary regulatory burden

NRC Commission Presentation
November 6, 1999

SECY 99-168 Overview

- ♦ Five year schedule
- ♦ Additional issues need to be addressed
- ♦ Additional guidance will assist decommissioning plants

NRC Commission Presentation
November 6, 1999

Significant Issues Need to be Addressed

- ♦ Site remediation criteria
- ♦ Design basis accidents
- ♦ Application of Part 50
- ♦ Rules for long term storage of HLW (10 CFR 72)

NRC Commission Presentation
November 6, 1999

Consistent application of existing regulations

- ♦ Some inconsistency continues to exist (Security, FFD, QA, EP, FP, Codes & Standards, etc.)
- ♦ Regulation by exemption
- ♦ NUREG 6451 provides reasonable guidance

NRC Commission Presentation
November 6, 1999

Competing and Conflicting Regulatory Mandates need to be Resolved

- ♦ EPA vs NRC site remediation requirements
- ♦ On site disposal of "clean waste" needs clarification
- ♦ NRC/EPA need to resolve total activity and/or average allowed concentrations

NRC Commission Presentation
November 6, 1999

B/18

Rules for Long Term Storage of HLW (10 CFR 72)

- ♦ General vs. Site Specific Part 72 license
- ♦ Site specific license will add burden, \$\$, and public hearings
- ♦ Part 50 does not properly address HLW storage
- ♦ Some licensees apply sections of Part 50 and Part 72

NRC Commission Presentation
November 4, 1999

Will Store HLW Without Clear Regulations

- ♦ 10 CFR 50 does not properly address HLW storage
- ♦ 10 CFR 72 provides clear regulations for HLW storage
- ♦ General (Part 72, Subpart K) license only intended for operating reactors

NRC Commission Presentation
November 4, 1999

All Design Bases Accidents Need to be Addressed

- ♦ Need to be risk based
- ♦ Considers zirconium fire
- ♦ Need to consider potential criticality
- ♦ Need to address other potential accidents

NRC Commission Presentation
November 4, 1999

Recommendations for the Commission

- ♦ Provide interim guidance (NUREG 6451) for decommissioning
- ♦ Direct the staff to proceed with rulemaking on an accelerated schedule
- ♦ Apply site specific requirements of 10 CFR 72 to decommissioning plants

NRC Commission Presentation
November 4, 1999

Recommendations for the Commission

- ♦ Evaluate all potential accidents
- ♦ Establish clear site remediation criteria
- ♦ Assure consistency and establish predictability
- ♦ Work closely with all stakeholders to enhance public confidence

NRC Commission Presentation
November 4, 1999