

May 19, 2000

NOTE TO: Samuel J. Collins, Director
Office of Nuclear Reactor Regulation

FROM: Ashok C. Thadani, Director
Office of Nuclear Regulatory Research

SUBJECT: RULEMAKING PLAN ON DECOMMISSIONING NUCLEAR PLANTS

The Office of Research concurs on the Commission Paper and integrated rulemaking plan for emergency planning, insurance, safeguards, operator staffing and training, and backfit at decommissioning nuclear power plants, that was forwarded by the memorandum from J. Zwolinski dated May 4, 2000.

We note that the Commission paper makes no reference to the research that contributed to the development and coordination of the technical basis for rulemaking. The section on coordination should be amended accordingly.

Additionally, as we proceed, beyond completion of the generic technical study and as part of the rulemaking, we should direct additional attention to confirmatory issues associated with thermal hydraulic analysis of pool heat up, fuel conditions, and fission product release and transport phenomena. We should also review consistency of seismic loading assumptions imposed on different types of nuclear installations (reactor, spent fuel pool, long term fuel storage).

Finally, acknowledging the issue of applicability of Reg. Guide 1.174 criteria to spent fuel pools, the package should be modified to include additional clarifying language to state to the effect:

The staff recognizes that the guide was developed for different types of accidents and regulatory decisions. However, we believe that this general comparison is reasonable, for the following reasons:

- The LERF guideline was developed from the Commission's Safety Goals, which are intended to broadly cover accident risks.
- While the amounts of fuel involved and mix of radionuclides available for release differ, spent fuel pool accidents and those considered in developing the guide's LERF guideline are estimated to provide roughly similar numbers and types of health effects.

cc: J. Zwolinski

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Template= RES-006 Accession Number RES File Code

I-103



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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