



# **Regulating Stand-Alone Independent Spent Fuel Storage Installations (ISFSIs)**

Sharpening the Focus

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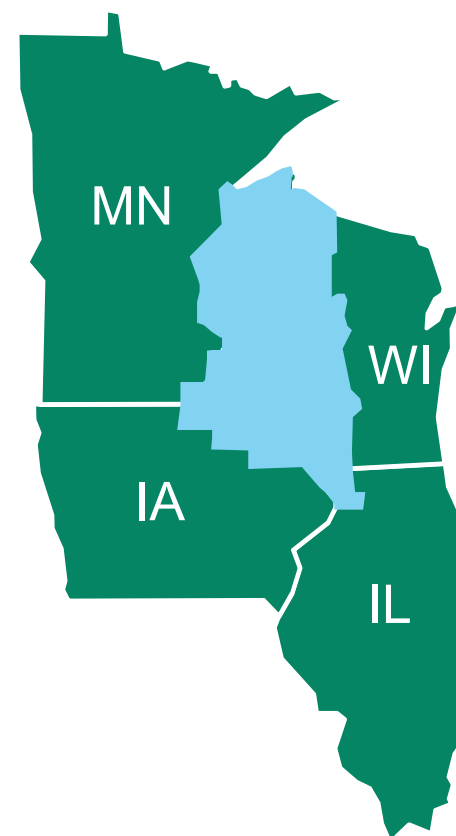
Dairyland Power Cooperative and the  
Decommissioning Plant Coalition

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# Dairyland Power Cooperative

- Generation and transmission cooperative located in La Crosse, WI. Owned and governed by our members.
- Serving 25 distribution cooperatives in four states: 600,000 end-use consumers.
- Annual revenues of \$415 million, 611 employees.



**The Dairyland Power  
Service Area**

# La Crosse Boiling Water Reactor (LACBWR)

- 50 MW reactor built by federal government as Phase II Demonstration Project of peaceful use of nuclear power; balance of plant built by Dairyland.
- Went critical in 1967, commercial operation in 1969.
- In 1973, Dairyland purchased the plant, steam generator and spent fuel.
- After successful operation, plant closed in 1987 for economic reasons.



## Since 1987...

- We have safely maintained 333 spent fuel assemblies in wet-pool storage, representing 38 MTU of fuel.
- 25 employees, costing \$6 million in current year.
- As a cooperative, 100% of these costs are passed directly to our members.





## Since 1987...

- Limited dismantling has resulted in two million pounds of material having been removed, including the reactor pressure vessel.
- ISFSI construction complete in 2012. Fuel is currently being moved there. ISFSI is located on-site, adjacent to an operating coal plant.





# Prompt Removal of Spent Fuel From Genoa is Our Goal

- Nuclear Waste Policy Act of 1982 established January 1998 date.
- We were one of the companies that developed the Private Fuel Storage project that demonstrated success in gaining NRC license.
- Dairyland has and does strongly support Yucca Mountain legislation and plans.
- Our community never agreed to long term storage.



# Blue Ribbon Commission on America's Nuclear Future

- Dairyland supports two key recommendations:
  - Prompt development of one or more Consolidated Interim Storage (CIS) facilities.
  - Spent fuel & GTCC currently being stored at shutdown reactor sites should be “first in line” for transfer to consolidated interim storage.



# Decommissioning Plant Coalition (DPC)

- Dairyland is a charter member of this group, formed in 2000.
- DPC is comprised of owners of permanently shut down facilities.
- Our purpose is working to remove fuel from our sites and addressing other issues unique to shutdown operations.

DPC Members have included Maine Yankee, Connecticut Yankee, Yankee Rowe, LaCrosse, Rancho Seco, and Big Rock.



# DPC Activities

- Have helped forge a consensus that SF & GTCC should be removed to CIS as soon as possible, especially for shut down plants.
- Engaged early and often with the Blue Ribbon Commission.
- Active with local, state, federal and Congressional stakeholders.
- Participate in regulatory activities of the NRC that impact permanently shut-down facilities.



# NRC and Shutdown Plant ISFSIs

- Current NRC SF management activities dominated by Yucca Mountain application impacts and an assumption that material will remain onsite for 100-300 years.
- We see this in Waste Confidence EIS draft assumptions, research into long-term storage issues and renewed security examinations.
- We consistently look to see if NRC considers the permanently shut down facilities as it begins new or revised initiatives.



# Impact of Current Efforts

- For the NRC – we see interest in improved early consideration of our sites but have seen little progress in supporting the intent that waste confidence decisions are not an endorsement of long-term on-site storage.
- For our sites—we see increasing tendencies to apply issues raised regarding the 100-300 year period to regulatory tasks for the 20-40-60 year period.





# What's Missing

- The Executive Branch and some in Congress appear ready to act upon the BRC recommendation for consolidated storage with a priority for movement from our sites.
- NRC needs to recognize this new assumption and focus resources to ready it, DOE, and our sites for removing material to CIS.



# What's Needed

- Commence planning the integration of regulatory resources to address current tasks and to plan for CIS and fuel removal.
- We need to begin discussion of a potential shipping campaign.
- The regulatory program must have a goal of avoiding unintended consequences of devoting resources to reactor long-term research and instead NRC should help set the stage for moving forward on this new assumption.



# Final Thought

- We understand that you are a regulatory agency, but we believe you can also be an advocate for a sensible forward looking national policy based on safety policy and best practices.
- NRC must articulate best practices for spent fuel from a safety and security standpoint.
- We believe movement of fuel from shutdown reactors to a CIS is such a best practice and NRC should state an expectation of progress toward its fulfillment.
- The NRC should encourage the Administration and Congress to establish a CIS program promptly.