



AMERICA'S NUCLEAR SOLUTION

Lessons Learned on WCS CISF License Application

Session #7 Consolidated Storage

REG CON 2016

Thursday, 8 DEC 2016

Overview

- Background: WCS – A Strong History in Nuclear Waste Operations
- Initial Application
- Requests for Supplemental Information
- Public Meetings
- “Reboot/Rebaseline”
- Lesson to be Learned (LTBL) 1
- LTBL 2
- LTBL 3



Background: WCS – A Strong History in Nuclear Waste Operations

- LLRW Interstate Compact disposal facility for Class A, B and C LLW
 - Added 9 MCF disposal capacity for NPPs & other commercial generators
- Federal offsite disposal facility for Class A, B and C LLRW and MLLW
 - Added 26 MCF of disposal capacity for DOE
- Direct disposal option for Class B/C LLRW
 - Depth and robust liner design are more protective than previous industry standards

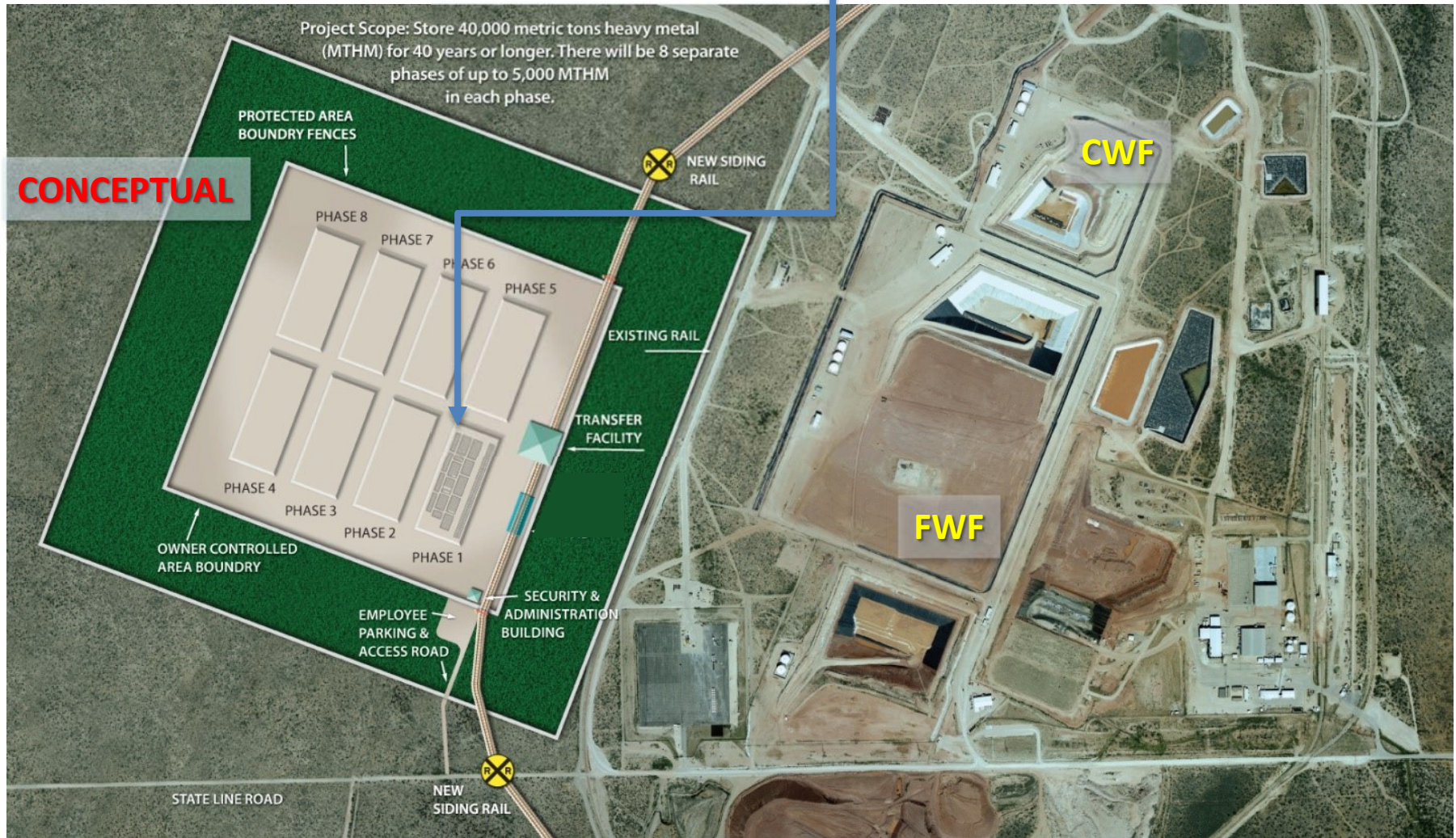


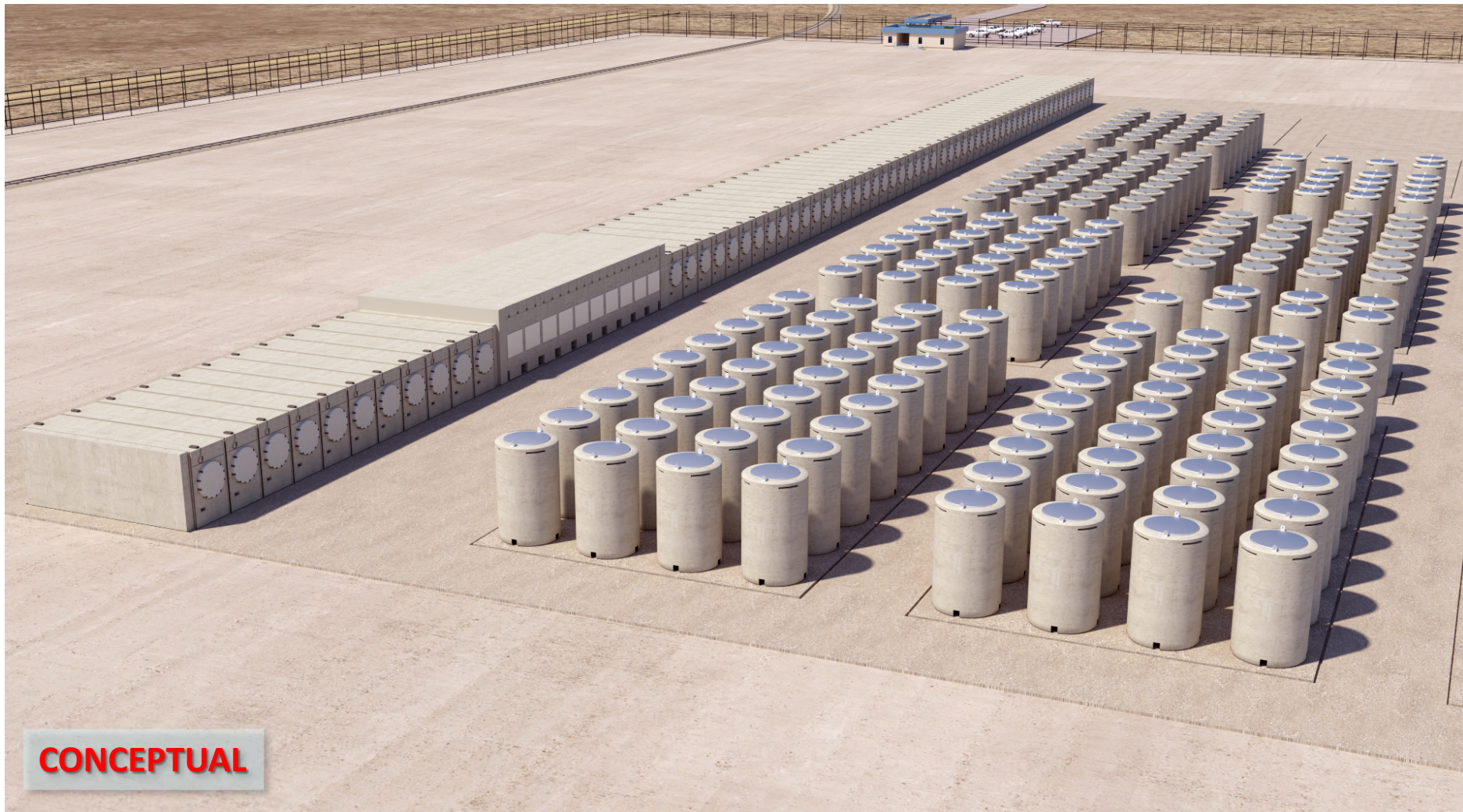
Initial Application

- Submitted on 28 April 2016
- First Part 72 License Application submitted since PFS (19 years)
- Proposed facility on WCS Site
 - Private property (320 acres, 2.2% of 14,000 acre site)
 - Ongoing nuclear waste operations
 - Strong state and local support and consent
 - Ideal environmental conditions



License Application Applies to Phase 1 of 8





CONCEPTUAL



Requests for Supplemental Information

- On 22 JUN 2016, WCS received notice of
 - 55 Non-proprietary RSIs
 - 5 Proprietary RSIs
 - 27 Security-Related RSIs(Proprietary)
- NRC RSI Letter held 3 principal criticisms
 - Licensing basis not clearly defined
 - Open-ended application (“any amendment”)
 - Level of Detail in certain sections not adequate



Public Meetings

- Three public meetings have been held
 - In-person meetings
 - 22 August 2016
 - 22 November 2016
 - Teleconference Meeting
 - 29 October 2016
- Significant benefit from meetings
 - Allowed WCS team to understand NRC positions on issues



“Reboot/Rebaseline”

- “Reboot” effort began in September 2016
 - NRC expressed concerns to WCS regarding the quality of the application
 - WCS response was to slow pace and make sure we were very clear on our objectives
 - Goal 1: establish shared expectations for outcome
 - Goal 2: Communicate frequently with NRC on expectations, comments and observations
 - Goal 3: prove WCS was up to task



“Reboot/Rebaseline”

- “Rebaseline” effort also began in September 2016
 - Established project controls and work breakdown structure
 - Created resource-informed schedule
 - Resulted in submittal schedule that focused on complete, accurate and high-quality responses
 - Defocused on schedule pressures.
 - Communicated early and often regarding new Project Management approach.



Lesson to be Learned – 1

- ***There Are No Secrets to the Part 72 Licensing Process***
 - Criteria are clearly communicated in
 - 10 CFR 72 – entirety of requirements & process
 - Reg. Guide 3.48 – SAR Format and content
 - NUREG 1567 (SRP) & SFST Interim Staff Guidance (ISGs)
 - Criteria for acceptance
 - Good example of successful effort in Private Fuel Storage (PFS) SAR



Lesson to be Learned – 2

- ***Strive For Clarity***

- *Reality*: Two partners with two very different configuration management systems
- *Challenge*: Maintain clarity when describing how two different systems perform same safety functions
- *Task*: Place yourself in the role of the reviewer
- *Goal*: *Ensure clarity prevails in lieu of complexity*



Lesson to be Learned – 3

- ***Transparency is Critical to Maintain Support***
 - WCS has maintained a dedicated website for this project at www.WCSstorage.com
 - All public NRC submittals, press releases and other information is posted to the website
 - WCS has provided status updates in the local newspaper and to local and state leadership
- Efforts are well received by all stakeholders



Lesson to be Learned – 3

- *Strong Evidence of Continuing Consent*
 - Texas state legislature
 - On three different occasions – approved radioactive waste disposal operations in Texas, and has specifically authorized waste from other states to come into Texas
 - Andrews County Commissioners
 - Unanimously approved a resolution supporting an interim storage facility in Andrews County, Texas, in January 2015
 - Texas Radiation Advisory Board (gubernatorial appointees)
 - Issued a statement supporting the siting of an interim storage facility in Texas in the fall of 2014, before WCS announced its plans.





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QUESTIONS?