Three Mile Island Unit 2

Environmental Regulatory Approach to TMI-2 Decommissioning







Presented to the U.S. Nuclear Regulatory Commission February 20, 2020



Purpose

- Introductions
- Provide brief history of TMI-2

 Accident, cleanup, PDMS
 - Current setting
- Describe TMI-2Solutions/GPU Nuclear current evaluation on environmental compliance for transition to DECON
- Gather insight/feedback from NRC staff
- Discuss next steps

Introductions



Affiliation	Name	Title
GPU Nuclear	Greg Halnon	President/Chief Nuclear Officer
	Mike Casey	TMI-2 Project Manager
	Beth Wetzel	Licensing Manager
	Jim Byrne	Decommissioning Manager
TMI-2 <i>Solutions</i>	Ron Worster	TMI-2 Project Director
	Gerry van Noordennen	V.P. Regulatory Affairs
	Kim Anthony	Environmental Manager



Brief History of TMI-2

- Construction permit November 1969
- Operating license February 1978
- Online December 1978
- Accident March 1979
- Cleanup and DOE acceptance of ~99% of damaged core material 1990
- Enter PDMS 1993

Reg Approach to Accident Cleanup

- Programmatic Environmental Impact
 Statement (PEIS) and Supplements 1 3
 - Analyzed four major activities
 - 1. Building and equipment decontamination
 - 2. Fuel removal and decontamination of the primary coolant system
 - 3. Treatment of radioactive liquids
 - 4. Packaging, handling, storage and transportation of radioactive wastes

Reg Approach to Accident Cleanu

- PEIS Main Report: Occupational dose most significant environmental impact of cleanup
- PEIS Supplement 1 (1984)
 - Re-evaluation of occupational dose and resulting health effects from cleanup
- PEIS Supplement 2 (1987)
 - Updated environmental evaluation of accidentgenerated water disposal alternatives
- PEIS Supplement 3 (1989)
 - Updated environmental evaluation of proposed cleanup effort, PDMS and alternatives

Reg Approach to Accident Cleanup

- PEIS Supplement 3 alternatives included:
 - Immediate or delayed cleanup of remaining 1% of accident waste
 - Immediate or delayed full decommissioning
 - Length of stay in PDMS
- No alternative superior, all bound by PEIS
- "Delayed Cleanup Alternative"
 - Selected course of action
 - PDMS followed by completion of cleanup

TMI-2 Chronology





1981 Programmatic Environmental Impact Statement 1984 Supplement 1: Occupational Radiation Dose 1987 Supplement 2: Accident-Generated Water 1989 Supplement 3: PDMS and Subsequent Cleanup

TMI-2 Current Setting





TMI-2 Work Phases





Phase 1a: Licensing, planning, engineering, transition (occurring now)
Phase 1b: Source term reduction (e.g., retrieval of remaining core debris)
Phase 2: Typical D&D, reduce licensed footprint to storage area only
Phase 3: Core debris management, license termination, site restoration

2020 Submittals





Between **Today** and entry into **DECON**, two submittals to NRC, each requiring environmental review:

1. PSDAR Rev. 4

- Update decom activities and environmental impacts
- 2. LAR for PDMS to DECON
 - Transition from PDMS to DECON
 - Part 51 NEPA review

TMI-2 SOLUTIONS **Environmental: Potential Pathways** GPU



NUCLEAR

Environmental: Proposed Pathway





Ongoing Evaluation of Current ElS

- Credit previously issued environmental analyses
- Compare existing analyses to current decommissioning plan, including:
 - Scope of PEIS discussion
 - Potential methods and technologies
 - Potential changes in population
 - Potential changed impacts
 - e.g., T&E species, air quality impacts

Decom GEIS Applicability



 Decommissioning GEIS (NUREG-0586) issued in 1988, supplemented in 2002

...decommissioning activities following shutdown of a facility after a major accident resulting in significant contamination of the site are outside the scope of this Supplement. For most types of accidents, decommissioning would be treated on a site-specific basis and, therefore, cannot be considered in a generic sense.

- However, endpoint of Phase 1b will be a radiological condition similar to an operating plant at the end of its operating life that has not undergone an accident
- Justification for reliance on GEIS will be provided in environmental reviews in PSDAR Rev. 4 and LAR submittals



Activity	Date
Submitted License Transfer Application	Nov. 12, 2019
Submitted PSDAR Rev. 3	Dec. 12, 2019
*Submit PSDAR Rev. 4	Q4 2020
*Submit LAR (PDMS to DECON)	Q4 2020

* Q4 2020 submittals are contingent upon LTA approval and the closing date occurs as scheduled



