

# **Lessons Learned: Decommissioning Funding Assurance**

**Decommissioning Lessons Learned Workshop  
May 2, 2023**

# Decommissioning Funding Regulations

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## **Operating Reactors – 10 CFR 50.75 “Reporting and recordkeeping for decommissioning planning”**

- Certification of funding assurance
- Minimum funding amount – Table of Minimum Amounts vs SSCE
- Methods of funding
- Decommissioning Funding Status reporting
- Decommissioning trust withdrawals during operation

## **Reactors in Decommissioning – 10 CFR 50.82 “Termination of License”**

- DCE reporting requirements
- Decommissioning funding spending requirements
- Decommissioning funding status reporting

# Opportunities for DFA Lessons-Learned Assessment

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## Decommissioning Funding Status Review Cycles

- Annually for reactors in decommissioning
- Biennially for operating reactors

## Other Assessments

- Reactor Decommissioning Financial Assurance Working Group (RDFAWG)

## Office of the Inspector General (OIG) Audits

# DFS Review Cycle Lessons-Learned Highlights

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## Identify and Implement Enhancements to DFS Review Program –

- Occurs at the end of a DFS review cycle
- Identify potential communication and analysis improvements
- Revisions to operating instruction, as necessary

## Examples of Previous Operating Instruction Revisions –

- Data processing process and analysis procedures
- Spot-check program revisions
- Review cycle close-out process

# **RDFAWG Lessons-Learned Highlights**

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## **Clarify Oversight of Expenditures as Part of DFS Reports –**

- Breakdown of DTF expenditures by decommissioning activity to facilitate verification

## **NRC Financial Analyst – Inspector Collaboration –**

- Two-way assistance between FAB analysts and inspection personnel

## **Spot Check Program for Reactors in Decommissioning –**

- Spot-check program currently in place for operating reactors expanded to include reactors in decommissioning

## **Reactor Decommissioning Financial Assurance Training Program –**

- Annual workshop providing HQ and Regional staff training on current FAB activities, processes, and insights

# OIG Lessons-Learned Highlights

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## **Improve Process Controls –**

- NRC staff enhancing DFS review training program
- Revisions to DFS review operating procedure

## **Tracking DFS Report Analyses –**

- Financial Assessment Branch (FAB) SharePoint updated to allow for NRC staff access to DFS reports and analyses
- FAB staff exploring means of making staff analyses publicly available to external stakeholders (Licensee DFS reports already public)

# Path Forward including Opportunity for Public Comment

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## Draft Guidance

- Guidance related to lessons learned would best “fit” in operating procedures and RG 1.159, “Assuring the Availability of Funds for Decommissioning Nuclear Reactors”
- RG 1.159 unavailable for revision at this time
- NRC staff is revising its review procedure, as appropriate, and considers development of interim staff guidance (ISG) the most efficient and effective means to address the issue until RG 1.159 is available for revision
- NRC staff expects a draft ISG to be issued for public comment in Summer of 2023
- NRC staff encourages public comments and recommendations on additional factors that would assist the NRC in assessing an exemption request

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