

Status of NRC ISG on MRCs and RDFAWG Completion

**Decommissioning Lessons Learned Workshop
January 15, 2025**

Agenda

- ISG on MRCs and Related Actions
- Remaining RDFAWG Recommendations
- Q & A

Interim Staff Guidance on Major Radioactive Components

Interim Staff Guidance (ISG) on the Use of the Decommissioning Trust Fund (DTF) During Operations for Major Radioactive Component (MRC) Disposal

- Published on August 5, 2024
- Purpose of ISG is to provide clarifying guidance to facilitate stakeholder understanding of the NRC's position on the use of the DTF during operations for MRC **disposal**, including what information would assist the NRC staff in assessing a licensee's request for exemption from the regulations related to the activity
- To date, two exemption requests related to MRC disposal during operations have been submitted

RDFAWG Completion

Reactor Decommissioning Financial Assurance Working Group (RDFAWG)

- RDFAWG Final Report published on April 29, 2020
- Purpose of RDFAWG
 - Leverage legal, licensing, and oversight expertise to evaluate the existing reactor decommissioning financial assurance regulations and licensing and oversight processes
 - Comprehensively document and evaluate whether the existing reactor decommissioning financial assurance program remains adequate with respect to how decommissioning is likely to be accomplished in the future or if the NRC has the appropriate infrastructure to identify any potential challenges
 - **Identify potential enhancements to improve the efficiency, effectiveness, and transparency of the program**

Outstanding Enhancements to Regulatory Guide (RG) 1.159, “Assuring the Availability of Funds for Decommissioning Nuclear Reactors”

- Clarify Oversight of DTF Expenditures as Part of Reviews of Annual Decommissioning Funding Status Reports
 - Clarifications would only require licensees to present the information in their DFS reports similar to how that information is already typically reported in their site-specific decommissioning cost estimates
- 30-Day Notification Guidance
 - Does not typically apply to reactors in decommissioning
- PSDAR Update Triggers
 - Provides guidance on what constitutes a significant increase in decommissioning costs, as discussed in 10 CFR 50.82(a)(7)
- Clarification of the Applicability of the Formula Amount
 - Clarifies that the 10 CFR 50.75(b)(1) requirement for decommissioning financial assurance to be more, but not less, than the 10 CFR 50.75(c) formula amount is only applicable until a licensee’s submittal of the certifications required under 10 CFR 50.82(a)(1)

Path Forward including Opportunity for Public Comment

Draft Guidance

- NRC staff will address guidance related to RDFAWG recommendations in RG 1.159, “Assuring the Availability of Funds for Decommissioning Nuclear Reactors” in Summer 2025
- RG 1.159 unavailable for revision at this time (currently part of Regulatory Improvements for Production and Utilization Facilities Transitioning to Decommissioning Final Rulemaking)
- NRC staff is considering the development of interim staff guidance (ISG) to address the issue should the availability of RG1.159 for revision extend beyond the expected date (Summer 2025)

Shawn W. Harwell

Financial Analyst, NRC Financial Assessment Branch

Shawn.Harwell@nrc.gov

301-415-1309