

# **NRC-Decommissioning Task Force Meeting**

**Mark Richter**

**Nuclear Energy Institute**

**April 23, 2015-Rockville, MD**

# Common Objectives

- Timely and efficient review process that informs rulemaking
- Strong documented regulatory basis for positions
- Stable and predictable regulatory environment through rulemaking- “One NRC...One Industry”
- Rulemaking consistent with NRC Principles of Good Regulation

# Agenda

- Introductions
- Industry Priorities
- Security
- Drug and Alcohol Programs
- Security Work Hours
- Aging Management
- Operations – Certified Fuel Handler Training
- Emergency Preparedness
- Exemption Process Feedback
- Industry Actions
- Rulemaking
- Key Industry Messages
- Closing Remarks
- List of Acronyms

# Industry Priorities

**Pam Cowan**

**Exelon**

**April 23, 2015-Rockville, MD**

# Industry Priorities

- Focus resources on resolving issues for plants currently in transition
  - Request NRC prioritize review of plant submittals over rulemaking
- Share decommissioning transition operating experience
- Inform 2019 Integrated Rulemaking – Industry intends to submit Petition

# Security and Drug & Alcohol Programs

**AJ Clore**

**Nuclear Energy Institute**

**April 23, 2015-Rockville, MD**



# Security

- Industry intends to submit an ISFSI Security Plan Template (NEI document) for NRC endorsement by the end of 2015
- NRC-endorsed NEI 11-08 currently provides guidance on submitting security plan changes
- Industry views current RAIs as inconsistent with NEI 11-08

# Drug & Alcohol Programs

- All four decommissioning transition sites are maintaining existing operating plant programs to assure FFD
- Once fuel is removed from pool, corporate-administered industrial programs will be adequate to assure FFD and safety and are consistent with previously decommissioned sites
- Corporate-administered industrial programs contain elements of Part 26



# Security Work Hours

**Nick Pappas**

**Arizona Public Service**

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# Security Work Hours

- Decommissioning plant personnel are no longer subject to 10 CFR 26 Subpart I
- Management of security work hours in an efficient manner should be addressed by guidance containing elements of Part 26
- To assure a consistent approach to comply with 10 CFR 73.55, NEI is developing guidance to be submitted for NRC endorsement by end of 2015

# Aging Management

Phyllis Dixon

Duke Energy Crystal River 3

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# Aging Management

- Decommissioning Plants have reduced risk and assure safety through existing plant programs that continue to be in effect after cessation of operations
- Regulatory uncertainty on this issue is delaying defueled Technical Specifications and fuel movements
- License renewal regulatory framework does not apply and is not necessary to assure safety at decommissioning plants

# Operations – CFH Training

**Phyllis Dixon**

**Duke Energy Crystal River 3**

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# Operations – CFH Training

- Draft document NEI 15-04 “Guidelines for Training and Qualification of Certified Fuel Handlers” is in industry review
- Revised target for submittal to NRC for endorsement review is third quarter 2015
- Draft document reflects results of previous public meetings with NRC and key considerations documented in recent safety evaluations

# Emergency Preparedness

**John Egdorf**

**Dominion Energy Kewaunee**

**April 23, 2015-Rockville, MD**

# Emergency Preparedness

- Industry is working on three phase approach
  - Permanently Shutdown
  - Permanently Defueled
  - ISFSI Only
- Industry's Petition for Rulemaking will be informed by lessons learned and industry FAQs



# Exemption Process Feedback and Industry Actions

Mark Richter

Nuclear Energy Institute

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# Exemption Process Feedback

- Dozens of submittals, each with multiple exemption requests for EP, Security and other areas have been made by the four sites in transition
- The exemption process is burdensome to both industry and NRC
- Rulemaking offers opportunity to streamline transition processes and reduce burden across the industry

# Industry Actions

- Submit ISFSI Security Plan Template by end of 2015
- Submit work hours guidance by end of 2015
- Work with NRC to resolve aging management applicability issues
- Submit industry guidance for CFH Training and Qualification in Q3 2015
- Inform industry Petition for Rulemaking with exemption process lessons learned

# Rulemaking

Pam Cowan

Exelon

April 23, 2015-Rockville, MD

# Industry Petition for Rulemaking

- Seeking a stable and predictable regulatory environment
- Will be targeted in scope to assure efficiency of process for plants that will decommission in future
- Regulatory requirements should be tiered, based on plant risk profile
- Petition, to be submitted by the end of 2015, can serve as an industry roadmap going forward

# Key Industry Messages

- Exemption and other reviews should be timely, efficient and inform future rulemaking
  - Approvals should be consistent with lower levels of risk in decommissioning
- Industry perceives that changes in NRC positions are being implemented through inspections and requests for information
  - Deviations from prior generic positions must be explained
- Rulemaking should be targeted to provide a stable and predictable regulatory environment
  - Focus should stay on the areas where exemptions and other regulatory relief has been sought, not on areas of the regulations where no adjustments have been needed

# Closing Remarks

**Pam Cowan and Mark Richter**  
**April 23, 2015-Rockville, MD**

# List of Acronyms

- CFH – Certified Fuel Handler
- CFR – Code of Federal Regulations
- EP – Emergency Preparedness
- FAQ – Frequently Asked Questions
- FFD – Fitness for Duty
- ISFSI – Independent Spent Fuel Storage Installation
- RAI – Request for Additional Information