

SOME COMMENTS ON
NRC'S APPROACH TO
DECOMMISSIONING
FINANCIAL ASSURANCE FOR
POWER REACTORS

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Presentation Topics

- Roles and responsibilities for component amounts
- Use of parent guarantees
- NRC intervention (e.g., "topping off") authority policy development

Roles and Responsibilities for Decommissioning Financial Assurance – Fund Accumulation and Spending

- NRC – radiologic only
- FERC – jurisdictional only
- State environmental and health agencies and USEPA – primarily non-radiologic
- PUC – ratepayer-funded costs

Roles and Responsibilities for Decommissioning Funding Assurance – Fund Accumulation and Spending (cont'd)

- Is the division of labor and accountability transparent?
- Are the respective dollar amounts clear to all?
- Are radiologic and non-radiologic fundings assured through separate mechanisms or otherwise walled off?

Parent Guarantees

- Experience with financial tests with solid technical bases has been excellent where reviewed, but significant concern and opposition exist
- Vulnerability/opposition is facilitated when some elements of the underlying financial test are or appear outdated. The staff has proposed appropriate fixes.

Intervention Authority Policy Development : Key Questions

- Who has it? Who needs it?
- When (criteria) and how (process) to exercise?
- Coordination with other agencies?
- Documented rationale (technical basis) for exercise of authority is desirable

Questions?