

Public Commission Meeting with NRC Stakeholders - July 26, 2016

Perspectives on NRC's Regulatory Programs

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Introduction



CY

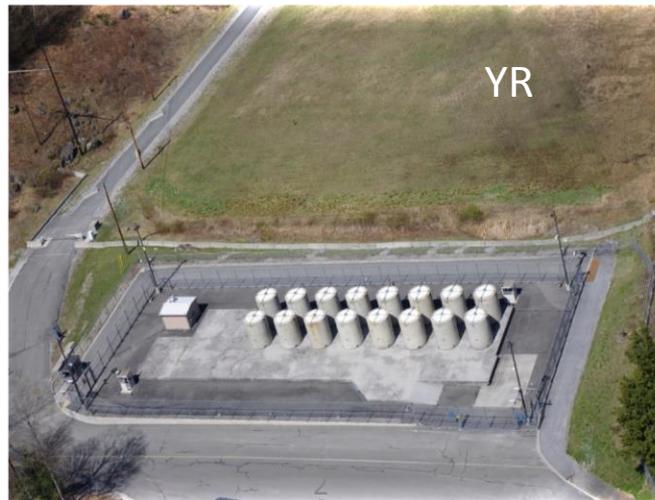
15 Spent Fuel Dry Casks
1 GTCC Dry Cask
NAC MPC System
CoC Expires 4/10/20



MY



40 Spent Fuel Dry Casks
3 GTCC Dry Casks
NAC MPC System
CoC Expires 4/10/20

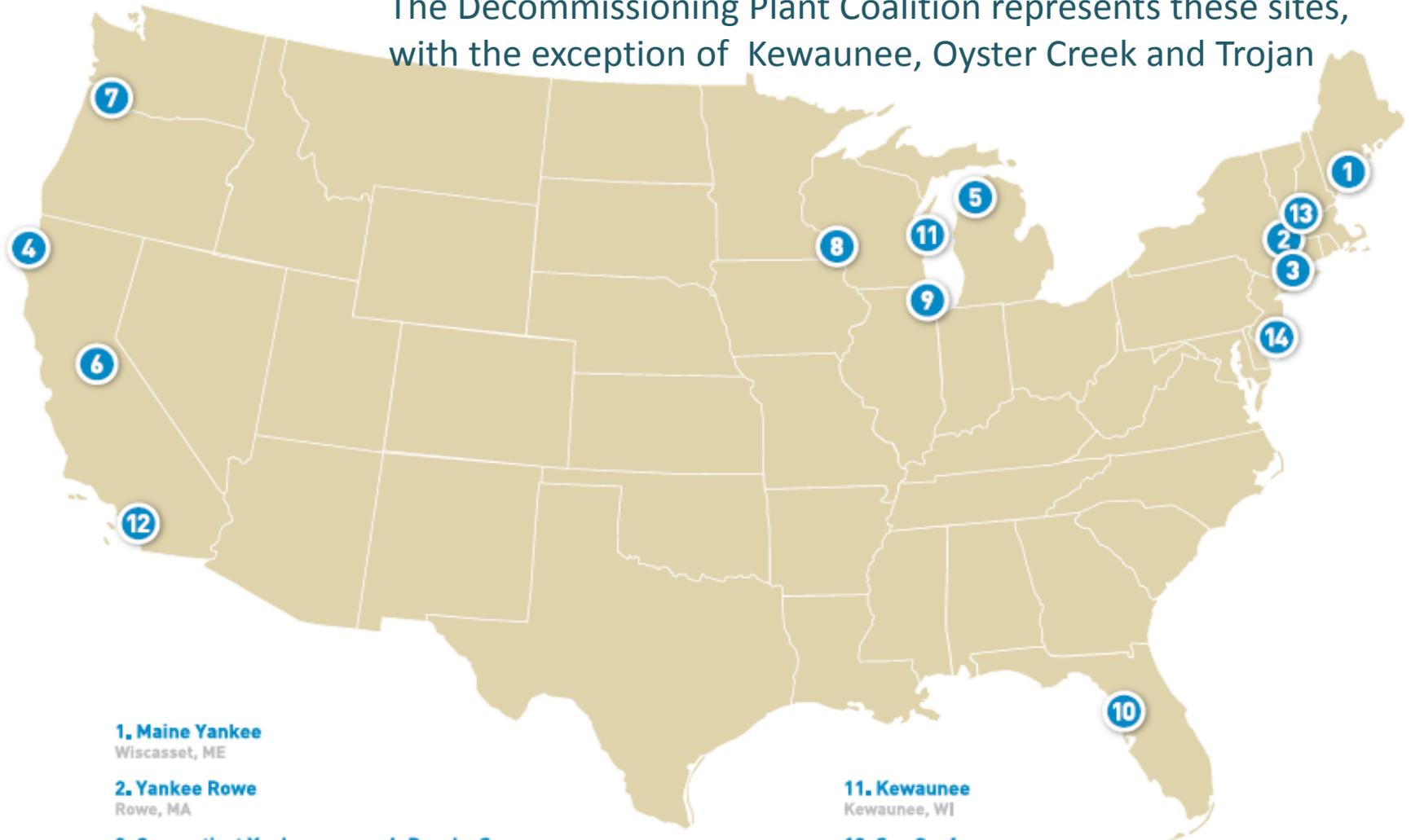


YR



60 Spent Fuel Dry Casks
4 GTCC Dry Casks
NAC UMS System
CoC Expires 11/20/20

The Decommissioning Plant Coalition represents these sites, with the exception of Kewaunee, Oyster Creek and Trojan



1. Maine Yankee
Wiscasset, ME

2. Yankee Rowe
Rowe, MA

3. Connecticut Yankee
Haddam Neck, CT

4. Humboldt Bay
Eureka, California

5. Big Rock
Charlevoix, Michigan

6. Rancho Seco
Herald, CA

7. Trojan
Rainier, OR

8. La Crosse
La Crosse, WI

9. Zion
Zion, IL

10. Crystal River
Crystal River, FL

11. Kewaunee
Kewaunee, WI

12. San Onofre
Pendleton, CA

13. Vermont Yankee
Vernon, VT

14. Oyster Creek
Leeds Point, NJ

Various Stages of Decommissioning

- Submittal of Certification that Plant will be Permanently Shutdown
- Submittal of Certification regarding the Permanent Removal of Fuel from the Reactor Pressure Vessel
- Submittal of PSDAR, including Decommissioning Cost Estimate, and Spent Fuel Management Plan
- Licensees may choose to enter SAFSTOR for a prolonged period
- Licensees engage in Active Decommissioning
- Licensees may choose to transfer fuel from the Spent Fuel Pool to an ISFSI
- All GTCC waste is stored at the ISFSI
- Licensee Achieves ISFSI Only status - the plant license has been reduced to include only the ISFSI, i.e., site decommissioning (with exception of ISFSI) is complete and only lands associated with the ISFSI remain within the site's NRC License
- Fuel and GTCC waste transferred to a DOE Facility
- ISFSI Decommissioning is Completed
- 10 CFR 50 License is Terminated

Licensing Efficiency and Effectiveness

- Current process for transitioning from operations to decommissioning requires licensees to request numerous exemptions and license amendments when transitioning from operations to decommissioning
- The Dry Cask Storage Regulatory Process is highly inefficient
 - Rulemaking is required to modify the Technical Specifications associated with Certificates of Compliance
- Rulemaking activities have not always given due consideration to Decommissioning Facilities (specifically, ISFSI Only Facilities)
 - Examples of historical rulemakings that should have considered impacts on Decommissioning Facilities - 10 CFR 37, 10 CFR 73.55, 10 CFR 50.47 and 10 CFR 50, Appendix E
 - Rulemaking should include statements regarding decommissioning facilities and ISFSI Only facilities.

Risk-Informed Regulatory Approaches

- The regulatory and rulemaking approach for Decommissioning and ISFSI Only sites needs to:
 - Recognize the significant risk reductions at the sites following permanent shutdown and permanent removal of fuel from the Reactor Pressure Vessel and achievement of ISFSI Only status
 - Be fully informed by past exemptions, approvals, and licensing actions
- Historical examples where a risk-informed regulatory approach could have been applied include 10 CFR 73.55 and 10 CFR 37 Rulemakings
- A risk-informed regulatory approach could be applied to:
 - Industry's proposal for a limited scope rulemaking to make the transition from operating to decommissioning requirements operable by rule – eliminating the need for exemptions and license amendments
 - Establishing a method to transition from a 10 CFR 50 Licensee to a 10 CFR 72 Licensee upon achieving ISFSI Only status without requiring the submission of a License Application

Prioritization of Regulatory Activities

- We appreciate NRC's recognition of reduced risk relative to dry cask storage (e.g., deferral of ISFSI security changes ; and ISG-2 rev. 2)
- NRC resources need to be focused on several specific activities (e.g., Canister relicensing; action on NEI petition for Part 72 Rulemaking; and Dry Cask TS changes)
- There are additional opportunities to provide a more efficient regulatory process in 10 CFR 50 and 10 CFR 72

Effectiveness of Public Engagement

- We want to acknowledge the efforts by NMSS/SFM Division in public outreach and involvement in the development of long-term dry cask storage requirements and guidance (NUREG 1927; and Aging Management)
- Future outreach efforts should continue to communicate the reduced risks and consequences of dry cask storage and effectiveness of licensee corrective action programs in addressing problems that may arise.