



# **NRC'S DECOMMISSIONING GUIDANCE**

## **TESTING THE NEW GUIDANCE--FEEDBACK TO DATE**

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**Organization of Agreement States Meeting**  
**October 3, 2000**

# OVERVIEW

- **Strategic Plan goals**
- **Key guidance documents**
- **License Termination Plan (LTP) reviews**
- **Stakeholder/public involvement**
- **How is it going?**
- **Future actions**

# LTP ACCEPTANCE REVIEW OBSERVATIONS

- **Completeness not adequacy or accuracy**
- **Two rejected LTPs**
- **One accepted LTP**
  - **Consistent with SRP in NUREG-1700**
  - **Followed lessons learned**
- **Ultimate acceptance**

# LTP ACCEPTANCE REVIEW OBSERVATIONS

- **Site characterization not sufficiently detailed**
- **Final Status Survey Plan lacked sufficient information**
- **Decommissioning costs not sufficiently detailed**

# LTP TECHNICAL REVIEW OBSERVATIONS

- **Reviews underway**
- **Requests for information (RAIs) are needed**
- **Fundamental flaws**
- **Face-to-face discussions**

# SRP FOR DECOMMISSIONING

- Detailed information for complex site (bounding)
- Tailor to complexity and safety significance
- Early/extensive public interactions with the licensee

# NOVEMBER STAKEHOLDER/PUBLIC WORKSHOP

- Purpose of workshop
- November 7-8, 2000
- Roundtable for stakeholder feedback

# HOW IS IT GOING?

- Regulation "grow in"
- Timing--needs/expectations
- Gaining experience
- Some adjustments needed
- Will be better

# FUTURE ACTIONS

- **Consolidate guidance**
- **Reexamine Regulatory Guide 1.179**
- **Reexamine Decommissioning SRP (lessons learned)**
- **Scrub decommissioning guidance (risk informed)**
- **Industry/NRC working group**

# Break

- More If You Want It.

# INSTITUTIONAL CONTROL FOR RESTRICTED RELEASE

- Legally enforceable institutional controls so doses will not exceed 25 mrem
- Assuming institutional controls are not longer in effect; doses will either:
  - Not exceed 100 mrem, or
  - Not exceed 500 mrem for special cases

# INSTITUTIONAL CONTROL (cont)

- **For 500 mrem cases:**
  - Further reductions to 100 mrem not technically achievable, prohibitively expensive, or result in net public or environmental harm
  - Durable institutional controls
  - Five-year rechecks of institutional controls
  - Government entity or independent third party responsible for rechecks, control, and maintenance

# INSTITUTIONAL CONTROL (cont)

- **Seek advice from affected parties/public on proposed institutional controls**
  - **Doses will not exceed 25 mrem**
  - **Will be enforceable**
  - **Will not impose undue burdens on the local community or other affected parties**
- **Sufficient financial assurance to provide the necessary institutional controls**

# FINANCIAL ASSURANCE REGULATIONS

## Reactors

- Amounts & Instruments  
§ 50.75
- Access to Funds  
§ 50.82

## Materials

- Amounts & Instruments  
§ 30.35, § 40.36, § 70.25
- Access to Funds  
Controlled in Financial  
Instruments

# FINANCIAL ASSURANCE REQUIREMENTS

- **Sufficient Amount**
- **Funds Reserved for Decommissioning Activities**
- **Funds Available When Needed**
- **NRC Can Direct Payments If Necessary**

# DRAWDOWN OF DECOMMISSIONING FUNDS

## Reactors

- 3% for Planning
- 20% after PSDAR<sup>1</sup>
- 100% after Site-Specific Cost Estimate

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<sup>1</sup>Post Shut Down Activities Report

## Materials

- Notify NRC 30 Days Prior to Withdrawal<sup>2</sup>
- < 10% of Balance Without Written NRC Approval

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<sup>2</sup>Applies to trusts and escrows

# STRATEGIC PLAN GOALS

- **Maintain safety and protection of the environment**
- **Increase public confidence**
- **Improve efficiency, effectiveness and realism**
- **Reduce unnecessary regulatory burden**

# KEY GUIDANCE DOCUMENTS

- **NUREG 1700, Standard Review Plan (SRP) for reactor LTP reviews**
- **Regulatory Guide 1.179, Standard Format and Content Guide for reactor LTPs**
- **SRP for decommissioning plan (DP) reviews**
- **Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM)**

# NUREG 1700--SRP FOR REACTOR LTP REVIEWS

- **Published for public comment**
- **Reviewed by CRGR**
- **Finalized in May 2000**

# REGULATORY GUIDE 1.179 STANDARD FORMAT AND CONTENT FOR LTP

- **General level of detail (consistent with regulation)**
- **Use with SRP (NUREG-1700)**
- **Requires licensee initiative**

# MARSSIM

- **Multi-agency guidance for survey methodology**
- **SRP references MARSSIM**
- **SRP provides further guidance on final survey design**
- **Positive feedback**

# STAKEHOLDER/PUBLIC INVOLVEMENT

- **LTR requires licensee interactions with public**
- **NEPA requires NRC interactions with public**
- **Strategic Plan goal**
- **Institute for Environmental Conflict Resolution**