

## WM2008 Conference Panel Reports

### **Session 14**

#### **Advanced use of D&D Funds for Major Component Disposal**

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Panelists: Tom Magette – Energy Solutions, Ralph Anderson – NEI

The objective of the session was to discuss the issues surrounding the advance use of D&D funds for the disposal of major components, such as steam generators, resulting from plant replacement during operation. An application has been made to the NRC for rule change or clarification.

#### Tom Magette

In his view the rule change application could be successful because:

- An application has been made
- It is site specific relating to D&D
- It can demonstrate that adequate funds exist in the D&D fund

A key aspect is the need for a plant specific cost estimate to demonstrate the adequacy of funds but such estimates are not always available. The thrust of the application is that application of ALARA and good housekeeping lead to the conclusion that early disposal of major components is the preferred option. Additionally the cost of disposal would seem to be rising faster than the growth of trust funds. There is not criticism of NRC but more a view that there are logical exceptions and without change ratepayers could be paying twice

#### Ralph Anderson

There are clear benefits for the early disposal of major components. Disposal facility availability is subject to change, there may soon only be one site, and we should take the opportunities when they exist. The number of components depends on lifetimes but is in the range of 20-60 and building interim storage facilities when disposal is possible seems illogical and therefore it makes sense for the NRC to have a rule that addressed the issue. NRC will advance the response but internal approval times can be lengthy. It is a change of policy and therefore needs to be carefully considered. The draft director's decision will be made public and this is open for comment. A site specific request has been made by South Texas.

#### Discussion

The following points were made in discussion:

- Query as to whether it really is a policy issue
- Link back to comment made at time of 1993 decommissioning rule change
- A number of current issues may cloud things such as whether some sites have adequate decommissioning funds, there needs to be a thorough justification of the remaining D&D funds, there have been critical reports of decommissioning trust funds and hence a tendency to be conservative
- Overall the decommissioning trust fund position has improved
- Petition really makes life easier for the NRC to consider without need for exemption