D&D Track Panel 22: March 16, 2015

15:15 - 17:00

Global Emerging Issues and Strategies

Focus: Why Immediate Dismantling is Being Preferred
Over Deferred Dismantling

Panelists

Mr. Jeff Hays, Vice President of Decommissioning, AREVA

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Co-Chairs

Dr. Jas Devgun, Sargent & Lundy

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Immediate Dismantling vs. Deferred Dismantling

*Remarks by Dr. Jas Devgun

"Why is this topic important

- Post Fukushima environment difficult for older reactors
- Harder to remain cost competitive
- Many likely to shutdown for economic and other reasons (before their licensed operating period ends)
- Projections show a steeper upswing in the D&D of power plants -worldwide
- "wait & see" strategy and "deferred dismantling" no longer acceptable in many cases

Why "Immediate Dismantling" is more advantageous and a preferable option

Another important topic

The shrinking "decommissioning cavalry"

^{*}The views expressed in this presentation are those of the speaker and do not necessarily reflect the views of his employer or the clients.

DECON vs SAFSTOR

DECON: Equipment, structures, removed or decontaminated to a level that permits radiological release (generally without restrictions)

Time frame: ≈ 10 years

SAFSTOR: Plant placed in a safe, stable condition and maintained in that state for long periods of time until subsequently it is decontaminated to levels that permits radiological release of the site Timer frame: ≈ 60 years (max)

Immediate Dismantling vs Deferred Dismantling

Many factors may contribute to this

- Regulatory Requirements (e.g., NRC in US)
- Multi-unit sites
- State intervention
- Public intervention
- Decommissioning fund status
- Maturity of technologies (D&D a mature industry)
- Retaining the knowledge of plant staff
- Land reuse

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Should optimized decommissioning option be assessed for each individual nuclear facility?

US DECON and SAFSTOR Options

- 10 CFR 50.82 requires decommissioning to be completed in 60 yrs
- Bases for maximum: SAFSTOR for 50 yrs + 10 yrs for decommissioning.
 - Radiation dose rates reduced to 1 2 %
 - Co-60 decay
 - Radioactive waste volumes reduced to 10%
 - Allows decommissioning fund to increase
- Coincidently, the time frame corresponds well with 20 year life extension for multi-unit sites
 - Initial incense 40 yrs
- 10 fully decommissioned (DECON)
- 13 being decommissioned (6 in DECON and 7 remain in SAFSTOR)
- Example of SAFSTOR: Dresden 1 in Morris, IL since late 1970s; Units 2 and 3 are still operating

Technologies are Mature

- Proven techniques and equipment are available for D&D
- Most technologies have now been well demonstrated in decom projects
- Worldwide: about 85 commercial reactors, 45 experimental or prototype power reactors, and over 250 research reactors have been retired
- Technologies are available for :
 - Radiological characterization
 - Decontamination
 - Dismantling
 - Equipment removal
 - Remote cutting
 - Robotic application
 - Packaging and transportation
 - Site status survey methodologies (e.g. MARSSIM)

Decommissioning Cost issue

Cost estimates (approx.):

Near Future: Vermont Yankee: \$1.24 billion

SONGS 2&3 \$4.4 billion

Current: Zion 1& 2: \$1.1 billion

Past: Big Rock Point: \$420 million

Main Yankee \$630 million

Yankee Rowe \$600 million

Connecticut Yankee \$820 million

Cost escalation - a big issue

Decommissioning Funds

- 10 CFR 50.75
- Funds Collected over operating lifetime of the reactor
- NRC minimum required (range from \$300 million to \$400 million)
 - Not sufficient/inadequate
 - GAO says (for example) for a plant license expiring in 2015 and with license extension to 2035, NRC determined cost represents only 57% of site-specific projected cost
- Public and state sentiments about "Raiding the Cookie Jar"
 e.g., use of Decommissioning fund for
 - moving fuel
 - other activities
 - need NRC permission
- "Decommissioning trust funds are the property of customers and dedicated irrevocably to decommissioning"



Public As a Stakeholder

- States are significant stakeholders
- Local public is a significant stakeholder
- 60 Years is beyond life expectation for people involved (after plant shutdown)
- Public reluctant to leave burden to next generation
- Local public interest in land re-use
- "Trust Issue"
- "Lifespan of corporations" a concern
- "Legal Issues"

International Guidance

Public as a Stakeholder

Examples

INSAG -20 (Stakeholder Involvement in Nuclear issues)

"Dismantling and closing nuclear installations, in particular when there is a release of the site for other applications, is often of concern to local and regional authorities and to the surrounding population"

IAEA NG-T-1.4 (Stakeholder Involvement Throughout the Life cycle of Nuclear Facilities)

"Local oversight of decommissioning and cleanup activities is now a feature of stakeholder involvement at closed nuclear facility sites in a growing number of Member States, and there is an abundance of experience providing best practice evaluation"

NEA 6859 (OECD 2010) (Public Attitudes to Nuclear power) "depth of concern on waste disposal"

Erosion of Public Confidence

- "Many factors can affect the SAFSTOR duration, and we cannot say with any certainty at this time how long SAFSTOR may last"
- "depends on the growth of the decommissioning fund"
- If "collected" funds are used for "other" activities, what will be left for actual dismantling/decommissioning"
- Federal government (DOE) inability to take spent fuel from the site
- Yucca Mountain site project closure; No Federal facility for SNF
- "Blue Ribbon Commission" and other studies- lack of progress on back end of the fuel cycle
- Public wants reasonable time frame: Maine Yankee 8 years, BRP 7 years, Yankee Rowe 14 years

SNF Issue Impact on Decommissioned Reactor Sites

ISFSI/Dry storage:

- Main Yankee, Connecticut Yankee, Trojan, Rancho Seco, Yankee Rowe, Big Rock Point, Humboldt Bay, La Crosse, and Zion 1&2
- Total from decommissioned reactor sites: ≈ 2,800 t

Advantages of moving to Central Storage:

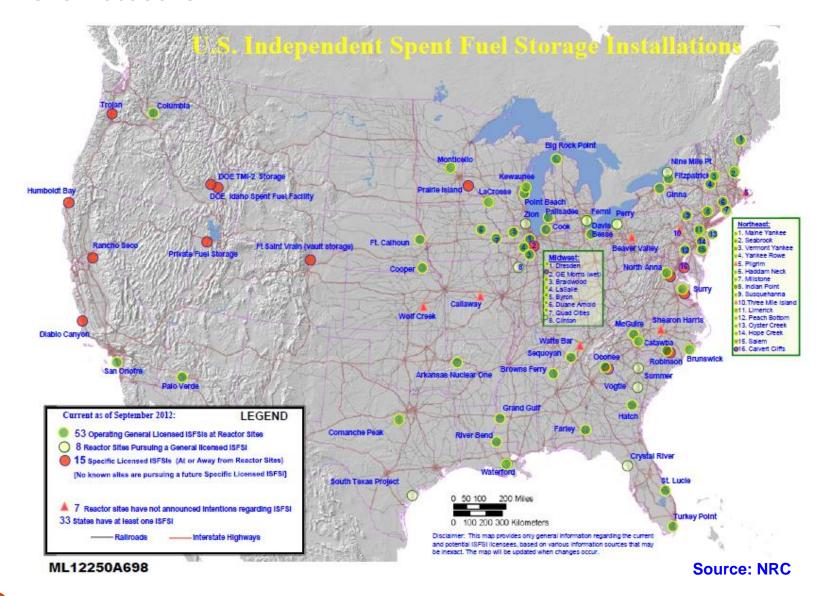
- Decommissioned sites are unique
 - No operating facilities
 - No revenue
 - Incentive to remove fuel from site



- Stand-alone facilities
- Security costs
- Maintaining license on the ISFSI site
- Consolidated storage will allow economies of scale and better security



ISFSI Locations



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Good Reasons for Selecting DECON

- Nuclear industry has substantial experience in DECON option
- Technologies are proven and available
- "Prompt" DECON ensures access to workforce and retired employees with legacy knowledge on the plant
- Class A waste disposal path still available
- Access to a licensed disposal facility for Class B and C waste
- Provides greater assurance and reduced uncertainty
 - on access to waste disposal
 - on cost (and fund status)
 - on regulations
 - mitigation of risk
- Returns site to other uses

Good Reasons for Selecting DECON

- Less expensive than SAFSTOR
- Reduces oversight costs in the long term
- Reduces emergency preparedness costs
- Allows completion of decommissioning in a safe, timely, and efficient manner
- Stewardship and best interests of stakeholders
- Ensures intergenerational equity