



Overview of State Decommissioning Activities September 2016

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September 22, 2016 NDCAP Meeting



On-Going Public Service Department Filings

Valid Uses of VY Decommissioning Trust Fund (DTF)

*Still awaiting Decision on this Appeal
to the NRC Commissioners*



Other Recent Public Service Department Filings

- ▶ Oppose EPZ Reduction to the VY Site fence line
 - *Entergy has agreed to fund VT Yankee-related offsite Emergency Management functions for the next two fiscal years (through June 2018)*
- ▶ Address Discontinuation Emergency Response Data System (ERDS) feed for VT Radiological Emergency Response Plan
 - *Entergy's agreement includes access to a replacement for ERDS.*

These will be discussed in detail later this evening.



Construction of Second VY Spent Fuel Dry Cask Storage Pad

CPG for constructing Second VY Dry Cask Storage Pad granted on June 17.

- ▶ Construction activities are underway
- ▶ State Agencies are providing oversight as necessary
 - ANR & VDH for hazmat
 - USNRC, PSD & VDH for radiological clean-up



Additional State Activities

Briefings between Entergy & State Nuclear Engineer, VDH & ANR on VY Site Groundwater Management continue

- Written summary received weekly
- Bi-weekly (*more or less*) teleconference
- Other issues discussed as necessary
 - e.g. In early July, ANR notified VY that its proposed incursion water discharges to CT River would require a special permit
 - VY subsequently suspended efforts to discharge treated incursion water



State – NRC Interactions

State Nuclear Engineer (& sometimes other State officials) participate in VY-Relevant NRC Public Meetings:

- ▶ Decommissioning Planning Rule Public Meeting (July 11)
 - PSD & Department of Health Participated
 - VY Examples used to emphasize need for early (plant operational) contamination clean-up
 - Written comments filed August 19 (with additional ANR comments)
- ▶ Rescheduled Fukushima Lessons Learned Webinar (July 14)
 - Treatment of Groundwater Incursions at Fukushima discussed
 - Except for implementing “frozen soil” barriers, VY’s incursion management is consistent with Fukushima



State – NRC Interactions

Additional VY-Relevant NRC Public Meetings:

- ▶ Project AIM 2020 Status Briefing (July 21)
 - Still focusing on consolidating administrative processes throughout Agency to reduce budgetary needs
 - Oversight of reactor decommissioning WILL NOT consolidate to NRC Headquarters



State – NRC Interactions

Additional VY-Relevant NRC Public Meetings:

- ▶ NRC Strategic Plan 2018-2022
 - Identifies the regulatory subjects that NRC must address to be effective
 - Existing and new regulatory subjects considered
 - Any required changes to existing regulatory subjects
 - Strategic Plan must mesh with Project Aim 2020
 - Stakeholder meeting held July 27
 - States consultation meeting held August 23
 - Draft plan due mid-2017; Final due February 2018



State – NRC Interactions

Additional VY-Relevant NRC Public Meetings:

- ▶ NRC Strategic Plan 2018-2022 (continued)
 - VT expressed need for:
 - Continuing Decommissioning Regulation Improvements
 - More rapid response to changing regulatory needs
 - Enhanced DTF oversight & growth projection methods
 - Improved interface between Federal Agencies (e.g. EPA & DOE)
 - Other states (particularly CT) called for:
 - State access to NRC regulatory processes similar to NRC Licensees
 - Items similar to VT's concerns



State – NRC Interactions

Additional VY-Relevant NRC Public Meetings:

- ▶ NRC “Backfit Rule” Public Meeting (SEP 13)
 - NRC Backfit process evaluates whether an issue identified at one nuclear facility should become a regional, national or industry-wide concern.
 - Committee to Review Generic Requirements (CRGR)
 - VT called for:
 - Enhanced assessment questions to assure issues appropriately addressed
 - Review of Backfit comments provided in VT’s Decommissioning ANPR filing
 - Option for CRGR Review of some “backfit-assessed” issues



State – NRC Interactions

Additional VY-Relevant NRC Public Meetings:

- ▶ NRC High Burn-Up Fuel Evaluations Status (SEP 21)
 - Summarized impact of cladding creep & hydride reorientation on High Burn-Up Fuel
 - Report on other High Burn-Up Fuel Phenomena to be issued “in near future”

- ▶ NRC Seeking to change its Public Meeting Process:
 - Meetings to be redefined as:
 - Observational
 - Informational (some public Q&A)
 - Comment Gathering (mostly public comments or Q&A)
 - Comment period open through November 14



State – NRC Interactions

The NRC's public meeting schedule is available at:

<http://www.nrc.gov/public-involve/public-meetings.html>

Includes webcast links, teleconference info, meeting archives & agendas.



State – Department of Energy Interactions

State Nuclear Engineer continues work with the DOE / National Transportation Stakeholders' Forum (NTSF) & Council of State Governments High Level Radwaste Transportation Task Force

- The Ad-Hoc Rail / Routing Working Group (AHWG) is updating Federal Railroad Administration (FRA) Safety Compliance Oversight Plan (SCOP) to address commercial spent nuclear fuel shipments.
- Draft expected for FRA & Association of State Rail Safety Managers review in November.
- Work on Route Selection Tool (START) continues.
- State Nuclear Engineer will attend AHWG & Radwaste Transportation Task Force meetings in November.



State – DOE Interactions (continued)

Related to the Rail / Routing AHWG efforts, NRC & US Department of Transportation seek Public Comments on update to “Regulations for the Safe Transport of Radioactive Material” (SSR-6)

- Update based on draft International Atomic Energy Agency (IAEA) Standard for Radioactive Materials Transportation
- Would update 10 CFR 71 & 49 CFR requirements
- Public Comments due October 28
- NRC & DOT will submit comments to IAEA later this year
- IAEA publication of new standard expected in late 2018

<https://www.federalregister.gov/documents/2016/09/13/2016-21960/hazardous-materials-international-regulations-for-the-safe-transport-of-radioactive-material-ssr-6>

Status of DOE Consent-Based Siting Process

- ▶ Public Comment Period concluded July 31
- ▶ DOE issued a Draft “Summary of Public Input” Report on September 15
- ▶ Attempts to summarize major themes heard from
 - Regional Public Meetings
 - Other Stakeholder Meetings & Conferences
 - Received Written Comments
- ▶ Also attempts to reflect the breadth & diversity of expressed views
- ▶ Comment period on Draft Report is open through October 30

Status of DOE Consent-Based Siting Process

- ▶ Finalized “Summary of Public Input” Report to be issued in December 2016
- ▶ A Draft Consent-Based Siting Process to be issued by end of 2016
- ▶ DOE intends to fund “informed local engagement” in 2017

Status of DOE Consent-Based Siting Process

- ▶ Consent-Based Siting Process Website:

<http://energy.gov/ne/consent-based-siting>

Includes:

- Draft “Summary of Public Input” Report
 - Consent-Based Siting Process Questionnaire
 - Recordings of all Consent-Based Siting Public Meetings
 - “Contact Us” at consentbasedsiting@hq.doe.gov
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- ▶ All original comments received can be found at:
<http://energy.gov/ne/downloads/invitation-public-comment-inform-design-consent-based-siting-process>
 - Includes comments filed by NDCAP Chair & State Nuclear Engineer



State Decommissioning Reminders

- ▶ NDCAP Meeting Schedules, Presentations, Approved Advisory Opinions, Annual Reports, meeting minutes & links to meeting recordings are available through the VT Public Service Department Website at:

<http://publicservice.vermont.gov/electric/ndcap>

- ▶ Comments / Questions for NDCAP may be emailed to PSD.NDCAP@vermont.gov or through PSD's Consumer Affairs & Public Information Division:

http://publicservice.vermont.gov/about_us/contact_us
800-622-4496



- ▶ Any additional comments from PSD, ANR, VDH or DEMHS?

- ▶ Questions?