

Destination:

# ***Termination***

NRC Regulatory Information  
Conference

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Termination...complete, timely  
and efficient...it's our Prime  
Objective



# Relax, not *that* kind...

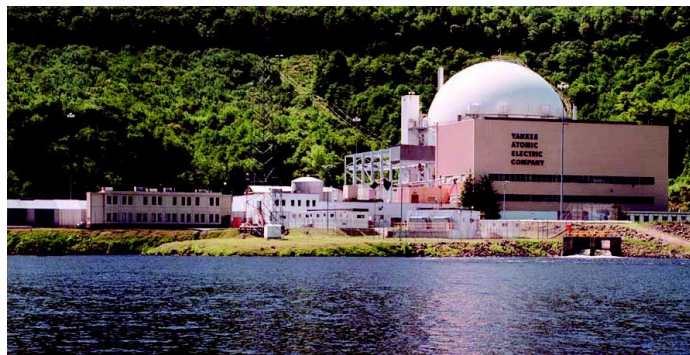
I mean the kind where a licensee requests that its operating license be **terminated** by the NRC, and a former nuclear power plant site is released by for **unrestricted use** by the public.

# Sustainability is the Theme



# Opportunity statement

- Timelines that make sense to communities and future investors.
- Projects that are performed with fiscal discipline and predictability.
- Companies that demonstrate strong environmental stewardship.
- **Result:** *A business enterprise that has earned the public trust, while highlighting the sustainability of nuclear energy.*



This result is not a foregone  
conclusion.

(THERE ARE A FEW CHALLENGES TO OVERCOME)

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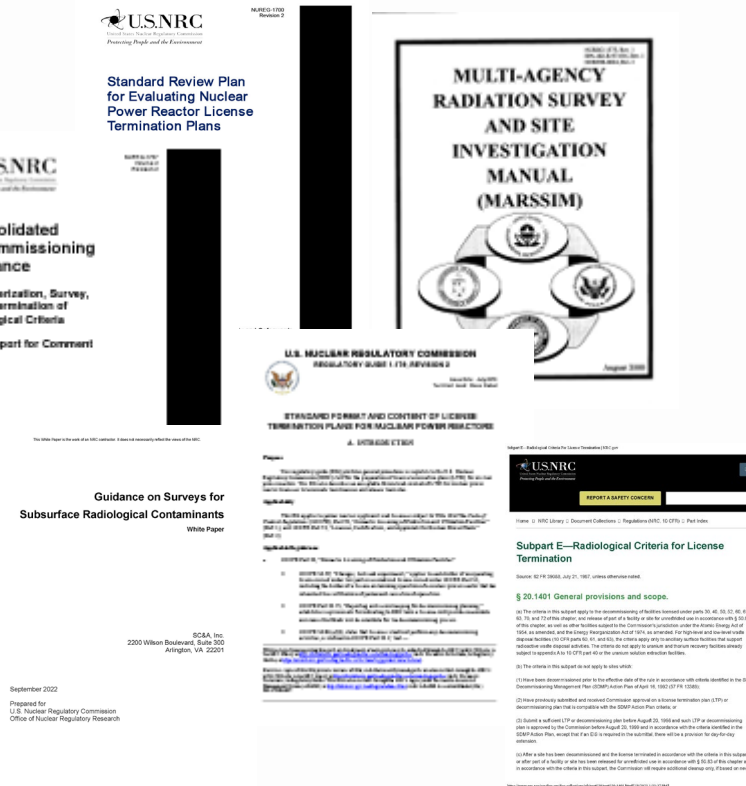
# But Solid Progress is Being Made

- Innovation and advancements in technology are accelerating spent fuel management, decontamination, dismantling, waste disposal and site remediation.
- The NRC is improving the regulatory framework for transitioning into decommissioning and is updating guidance.
- Companies are beginning to work together where it makes sense in a market that is competitive.
- NRC is holding public workshops and committing resources to resolve open technical issues.

# There are Significant Challenges in the “Red Zone”

## The “playbook” for the License Termination Process could use a “tune-up:”

- Regulatory guidance is voluminous complex.
- There are open technical issues.
- Experience and qualified personnel are in limited supply.



# Process is Prone to Instability and Rework

- LTPs contain the acceptance criteria for the work done.
- LTPs must be submitted for NRC review and approval at least 2 years before a request to terminate a license.
- NRC's approval governs much of the work conducted throughout the course of the project
- But by then, most if not all the major D&D work is already done!
- ...which means much of that work was done “at risk.”
- What could possibly go wrong?



# Industry solution: NEI 22-01, “License Termination Process”

- Consolidate regulatory guidance in one place.
  - Make it specific to commercial reactors.
  - Emphasize the value of (very) early planning.
  - Research and add OE to direct users to what worked and what didn't.
  - Encourage early and often regulatory engagement.
  - Provide a vehicle to capture continuous learning and improvement.
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- **NEI 22-01 submitted for NRC review and endorsement February 2023.**

# Collaborative efforts to improve

Industry recognizes that sharing lessons learned is not the natural trait of a competitive marketplace.

Collectively we are working together where it makes sense.

Industry is working with NRC to seek opportunities to enhance learning.



# NEI Decommissioning Organization

