

DECOMMISSIONING FROM THE FRONT LINES

HISTORY, EXPERIENCE, AND THE PATH FORWARD

Deb Katz

Executive Director

Citizens Awareness Network



Contact:

(413) 339-5781

deb@nukerbusters.org

www.nukerbusters.org

Twitter: @nukerbusters

Decommissioning

- Demonstrates Colossal Failure of nuclear power
- Nuclear reactors are toxic waste dumps
- Cleanup costs skyrocket as surveys uncover greater plumes of contamination
- Yankee Rowe site never released because of PCB contamination



Underfunded Utility-Owned Decommissioning Funds

- Yankee Rowe and Connecticut Yankee decom funds substantially underfunded
- Yankee Rowe cost \$39 million to build
 - over \$700 million to cleanup
 - CT Yankee decom cost over \$1 billion
- Operators return to the rate base to shore up funding

Underfunded Merchant Reactors: Crisis in Funding

- 1990s Deregulation of Electricity
 - Separated Generation from Transmission and Delivery
- Created a Fire Sale on Old Nukes
- Merchant Plants Sell Power to Utilities or on the Market
- No Ratebase to Cover Decommissioning Shortfalls
 - No Way to Replenish Decommissioning Funds
 - SAFSTOR: Reactors Mothballed for Decades
- Concerns about corporate responsibility

NRC and Decommissioning Before Yankee Rowe:

- Classified as Major Federal Action under NEPA
 - Required Oversight by NRC and EPA
- Detailed Decom Plans with Clear Commitments
- Onsite Resident Inspectors
- Full Public Hearing Rights
 - NRC Subpart D: Cross examination and Discovery

Decommissioning at a Regulation Crossroads

- Yankee Rowe's Cleanup Deregulated Decommissioning
 - No Longer Considered a Major Federal Action
 - No Detailed Plans Required
 - No On-Site Resident NRC Inspectors
 - Limited Oversight
- Corporations Can Strip and Ship Components with a 12-page Document
- NRC Hearing Rights Curtailed
 - Subpart I: No Ability to Cross Examine Witnesses

Decommissioning Options

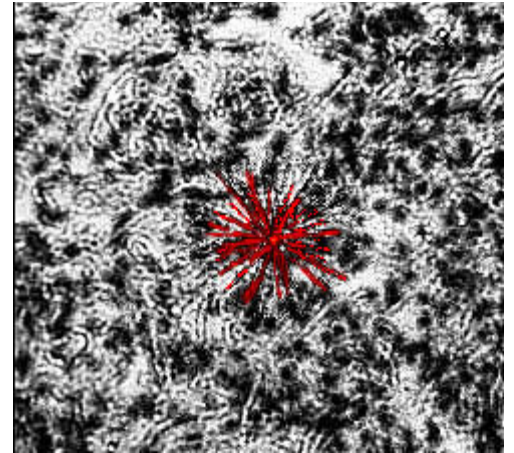
NRC Regulations Provide Three Options:

- **DECON** – rapid dismantlement
- **SAFSTOR** – up to 60 years to complete site restoration
- **ENTOMB** – never released for unrestricted use



Dangers of DECON – Rapid Dismantlement

- Higher Worker Exposures
 - Contamination of Site with Hot Particles
- Potential to Contaminate the Community
- Higher Rad Waste Disposal Costs



- Ethical and Environmental Justice Issues
 - “Cleaning Up” One Community by Contaminating Another

Dangers of SAFSTOR

- Mothballing Reactor for Decades
 - Loss of Skilled Workforce
 - Contamination Spreads Unchecked
- Raiding the Decom Trust Fund
- Corporate Accountability
 - LLC Structure and Parent Company Liability
- Risk to States and Communities
 - Abandonment of the Site
 - Taxpayers and Ratepayers End Up Paying

Decommissioning: Thorough and Responsible

CAN developed our own model to change the debate

Planned Decommissioning & Site Remediation (PDSR)

- Begin immediately upon closure:
 - Retain the Skilled Workforce with Institutional Memory
 - Transfer High-Level Waste to Hardened Dry-Cask Storage
 - Commence Site Surveys and Detailed Planning
 - Remove Non-Essential Buildings
 - Routine Radiological Inspections
 - Environmental and Radiation Monitoring Program
- Develop Decontamination and Dismantlement Plan

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