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Regulation, Innovation and
Collaboration for a Safer Tomorrow
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Bethesda North Marriott Hotel
and Conference Center
Rockville, MD
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T5—Right-Sizing Agency Oversight and Inspection

Revisions to agency oversight and inspection based on the requirements of section 507 of the ADVANCE Act and Executive Order 14300

Opening Remarks

Philip McKenna
Acting Deputy Director, Office of Nuclear Security and Incident Response (NSIR)

Panelists

Gerond George, Chief, Inspection and Oversight Branch, Division of Fuel Management, Office of Nuclear Material Safety and Safeguards (NMSS), NRC

Tim Riti, Director, Regulatory Affairs, Nuclear Energy Institute (NEI)

Michael Callahan, Decommissioning Plant Coalition

Agenda

- Opening Remarks
- NRR/NSIR Oversight and Inspection Presentation
  - Philip McKenna
- NMSS Oversight and Inspection Presentation
  - Gerond George
- NEI Oversight and Inspection Presentation
  - Tim Riti
- Decommissioning Plant Coalition
  - Michael Callahan

Overview of the Accelerating Deployment of Versatile, Advanced Nuclear for Clean Energy Act of 2024 (ADVANCE Act) and Executive Order 14300

- Section 507 of the ADVANCE Act required the NRC to submit a report to Congress that identifies specific improvements to nuclear reactor and materials oversight and inspection programs. On July 10, 2025, the Commission submitted the NRC's report in response to the section 507 requirement (ML25077A245). This report outlined the changes proposed in SECY-25-0045, including several near-term modifications to enhance the efficiency and effectiveness of the Reactor Oversight Process (ROP) that were implemented on July 1, 2025.
- On May 23, 2025, the President issued Executive Order 14300. Section 5(g) directed the NRC to revise the ROP and reactor security rules and requirements to reduce unnecessary burdens and be responsive to credible risks.

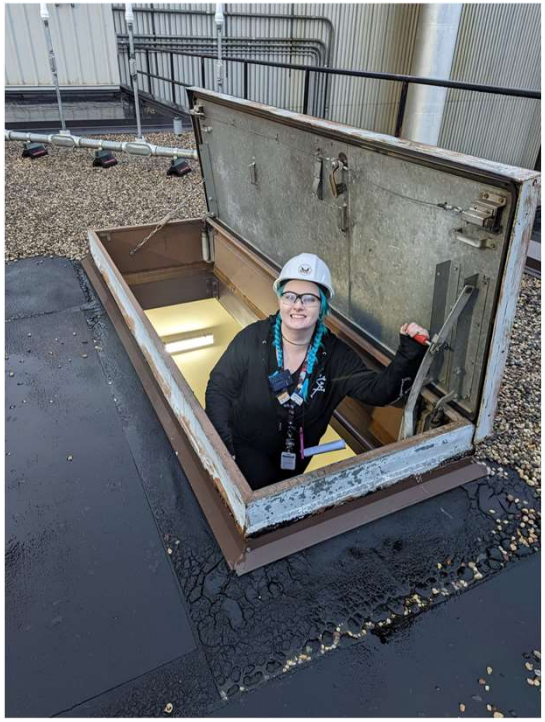
Operating Reactor Oversight and Inspection

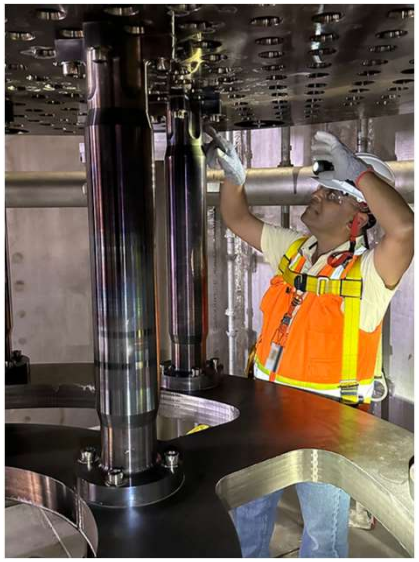
ROP Background

- The NRC implemented the ROP in 2000 as a response to concerns with the agency's prior oversight framework, the systematic assessment of licensee performance (SALP) process, which was viewed as inconsistent, highly subjective, and lacking transparency.
- The foundation of the ROP is in SECY-99-007, "Recommendations for Reactor Oversight Process Improvements," dated January 8, 1999 (ML992740074):
  - The staff proposed a more objective, risk-informed, and performance-based oversight approach to better reflect the actual safety significance of issues identified at nuclear power plants.
  - One of the central goals of SECY-99-007 was to ensure that NRC oversight activities focused on risk-significant areas of plant operations and that agency resources were applied consistently across all reactor sites.

Changes to the ROP since 2000

- **April 2000**: ROP—replaced the SALP process for oversight of operating power reactors (SRM-SECY-00-0049):
  - "The full-scale initial implementation of the ROP will inevitably reveal issues that were not exposed in the pilot program. The staff should anticipate that adjustments—perhaps significant adjustments—will be necessary as the program unfolds. The staff should keep the Commission informed and should promptly bring issues of policy significance to the Commission for resolution."
- **2001**: 9/11 terrorist attacks—security cornerstone separated from the rest of the ROP
- **2002**: Davis-Besse Reactor Vessel Head Degradation—lessons learned resulted in many changes to baseline inspections
- **2003**: Mitigating Systems Performance Index—replaced Safety System Unavailability PIs
- **2006**: Cross Cutting Issues Program—formalized safety culture oversight:
  - Based on SRM-SECY-04-0111, "Staff Requirements—SECY-04-0111—Recommended Staff Actions Regarding Agency Guidance in the Areas of Safety Conscious Work Environment and Safety Culture," dated August 30, 2004
  - Cross-cutting aspects established for problem identification and resolution (PI&R) (identification, evaluation, corrective action), human performance (personnel, resources, organization), and safety conscious work environment to aid in determining the existence of a cross-cutting theme
  - Third criterion highlighted regarding confidence in a licensee's characterization and progress in addressing the cross-cutting theme
- **2012**: Security cornerstone—reintegrated into the ROP (SRM-SECY-11-0073)
- **2012**: ROP enhancement effort—kickoff
  - Review of all baseline inspection procedures (IPs), assessment program, and communications





- **2013**: ROP Independent Assessment Report (McDermott Report)—8 recommendations, 10 suggestions
  - Review directed in SRM-SECY-12-0081
  - **Recommendation 5:** The NRC should review the criteria for transition to Column 3 of the NRC Action Matrix against the original ROP program goals to ensure that the significance of White inspection findings is not being overemphasized and to ensure that agency resources used to process White inspection findings are commensurate with findings that, by definition, are of low to moderate safety significance.
  - **Recommendation 6**: The NRC should perform a comprehensive analysis to determine whether the use of cross-cutting issues and safety culture, as currently incorporated in the ROP, provides regulatory value in terms of licensee safety performance for the resources expended.
- **2015**: Significant changes to the Cross Cutting Issues Program
  - Increase the threshold for a cross-cutting theme to six for all cross-cutting aspects, except for safety conscious work environment.
  - Eliminate subjective questions for opening a substantive cross-cutting issue (SCCI). First two occurrences of a theme would just be documented in an assessment letter. After a third consecutive occurrence, a cross-cutting issue would be assigned.
  - For Column 4 plants, all SCCIs would be closed out in the confirmatory action letter closing out the inspection under IP 95003.
  - Develop a backstop at the cross-cutting area level. (Human Performance=20; PI&R=12.) This would be a new criterion to identify a cross-cutting theme.
  - Consider additional actions for licensees after the second consecutive assessment cycle with the same SCCI. (Discuss at the Agency Action Review Meeting or have an option for the Regional Administrator to meet with the licensee Board of Directors.)
  - Revise the terminology (eliminate “substantive” and call them “cross-cutting issues”).

- **2016**: Revision of the definition of degraded cornerstone from two White inputs in a single cornerstone to three White inputs (SRM-SECY-15-0108)
- **2016**: Elimination of mid-cycle assessment meetings (SRM-SECY-16-0009)
- **2018**: Recommendation of revisions to the engineering inspection program (SECY-18-0113)
- **2018**: Second ROP Enhancement Initiative (SECY-19-0067)
  - Recommendations to eliminate four-quarter requirement, revise treatment of greater-than-Green (GTG) performance indicators (PIs), revise frequency of PI&R inspection to triennial, revise the emergency preparedness significance determination process (EP SDP), and revise baseline inspection sample sizes for certain IPs
- **2019**: Introduction of Very Low Safety Significance Issue Resolution (VLSSIR) Process
- **2021**: Withdrawal of SECY-18-0113 and SECY-19-0067 in August

- **2022:**
  - SECY-22-0053—Recommended revising the engineering inspection program to a quadrennial cycle
  - SECY-22-0086—Recommended eliminating the four-quarter requirement and revising treatment of GTG PIs
  - SECY-22-0087—Recommended continuing biennial frequency of PI&R inspection
  - SECY-22-0089—Recommended revising the EP SDP
- **2024**: ADVANCE Act signed and work started to revise the ROP
- **2025**: On June 5, issued SECY-25-0045, "Recommendations for Revising the Reactor Oversight Process"
- **2025**: On July 10, sent "Improving Oversight and Inspection Programs" to Congress as required by ADVANCE Act section 507
- **2025**: On October 21, issued SECY-25-0087, "Recommended Revisions to the Baseline Security Significance Determination Process"
- **2026**: On January 26, SRM-SECY-25-0045 issued

ADVANCE Act Work on Development of Proposed Revisions to the ROP

- The staff established a cross-organizational team with representation from NRR and each regional office.
- The team assessed the following program areas and developed options and recommendations to improve efficiency: Inspection Program, Assessment Program, and Cross Cutting Issues Program.
- The team reviewed stakeholder recommendations from the 2018 ROP Enhancement Project.
  - Including recommendations that had been rejected or deferred, and recommendations previously submitted to the Commission that were either retracted or disapproved.
- The staff sought input from both internal and external stakeholders to inform its evaluation and implementation of ADVANCE Act section 507.
  - Staff ADVANCE Act Engagement Portal
  - Presentations from the regional project team members
  - Staff Townhalls
  - Consolidated list of all input

ADVANCE Act Work on Development of Proposed Revisions to the ROP (cont.)

- On October 28, 2024, the NEI submitted a letter to the NRC with recommendations for the staff to consider when implementing section 507 of the ADVANCE Act.
- The staff evaluated each of these recommendations and found that nearly all aligned with internal staff feedback.
- For example, the staff identified a common theme highlighting a need to perform a comprehensive review of the ROP. Specifically, the following suggestions led to the staff's decision to pursue a comprehensive review of the ROP:
  - Investigate and evaluate the return value on baseline inspections.
  - Review IPs and eliminate duplicative inspection requirements.
  - Revisit previous staff PI&R inspection recommendations.
  - Reconsider the focus areas and tasks of resident inspectors.
  - Revisit PI&R team inspection frequency.

ROP Revisions Implemented on 1 July 2025

- Revised IMC 2515 guidance to inspect to minimum samples from nominal samples.
- ROP team inspection can now be performed in an “hybrid” format reducing onsite duration from 2 weeks to 1 week (2nd week conducted remotely) (CETI exception).
- CETI Inspection team reduced from 7 to 6 inspectors.
- Entrance/Exit Meetings
  - Entrance meetings optional (coordinate with licensee) and minimal in time
  - Exit meetings – can be remote meetings.
- Licensee Event Reports (LERs) (10 Part 50.73)
  - Do not have to be re-inspected in IP 71153 to close the LER in an Inspection Report

ROP Revisions Implemented on 1 July 2025

- Dual Path Processing Revision
  - Dual path guidance (for TE violations) has been revised in IMC 0612 Appendix B
  - No longer done for findings that would screen to Green
  - For GTG findings decision will be made at the Enforcement Panel / SERP whether to pursue processing through ROP
- Documentation Requests
  - Elimination of Boiler plate documentation requests.
- Expansion of VLSSIR considerations
  - Clarified the limit for effort expended on very low safety significant issues before requiring management evaluation of VLSSIR criteria.
  - Expanded the scope of the VLSSIR process to include all unclear non-compliance issues (issues involving the licensing basis, design basis, or regulatory requirements in which there is ambiguity).
  - Process is Agency-wide and guidance is in respective oversight program IMCs

ROP Revisions Awaiting Guidance Issuance in 2026

- Revise the IMC 0612 guidance pertaining to the definition of “licensee-identified” findings.
  - Allowing the staff to grant identification credit for findings resulting from a good questioning attitude by plant staff.
  - “Self-revealing” finding definition will not change.
- Eliminate two IPs used by the staff to review licensee corrective actions for traditional enforcement violations:
  - IP 92722, "Follow-Up Inspection for Any Severity Level I or II Traditional Enforcement Violation or for Two or More Severity Level Ill Traditional Enforcement Violations in a 12-Month Period,“
  - IP 92723, "Follow-Up Inspection for One Severity Level Ill and Two Severity Level IV Traditional Enforcement Violations or for Three or More Severity Level IV Traditional Enforcement Violations in the Same Area in a 12-Month Period.
  - This change will eliminate procedure redundancy with no impact to inspection program effectiveness. Issue follow-up will occur by either:
    - PI&R samples, including select issue follow-up and semiannual trend reviews, or
    - IP 92702, "Follow-Up on Traditional Enforcement Actions Including Violations, Deviations, Confirmatory Action Letters, and Orders"

Approved Staff-Recommended Revisions to the ROP Baseline Inspection Program (SRM-SECY 25-0045)

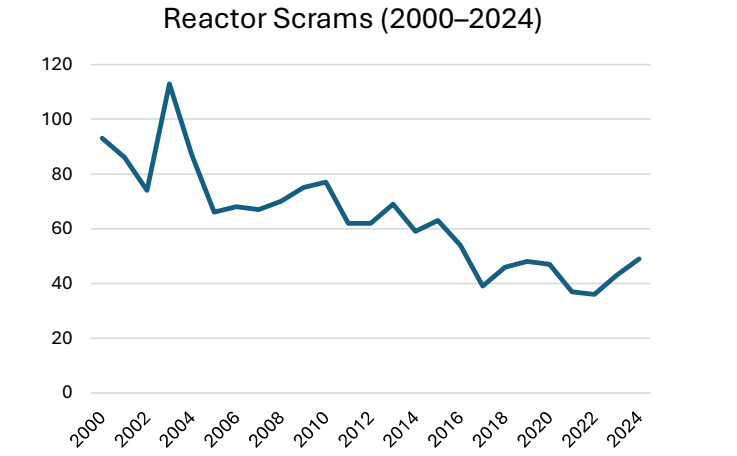
- Assessment Program:
  - Revise the treatment of licensee-identified White inspection findings such that they are not considered as Action Matrix inputs. The findings will still require inspection for closure.
  - Revise the Action Matrix criteria so that multiple White inputs in Column 2 of the Action Matrix do not aggregate to result in assessment in Column 3.
  - Suspend the Agency Action Review Meeting unless a licensee meets the criteria in Management Directive 8.14.
- Cross Cutting Issues Program: Simplify the Cross Cutting Issues Program to characterize inspection findings by cross-cutting theme rather than by cross-cutting aspect, thereby reducing the characterization options from 23 to 3; this would reduce subjectivity and decrease the use of NRC inspector and licensee resources to determine the most appropriate causal factor for the finding.
- NRC-Developed Power Reactor Initial Operator Licensing Examinations: Remove the requirement from NUREG-1021 for each NRC region to write at least one power reactor initial operator licensing examination per year.

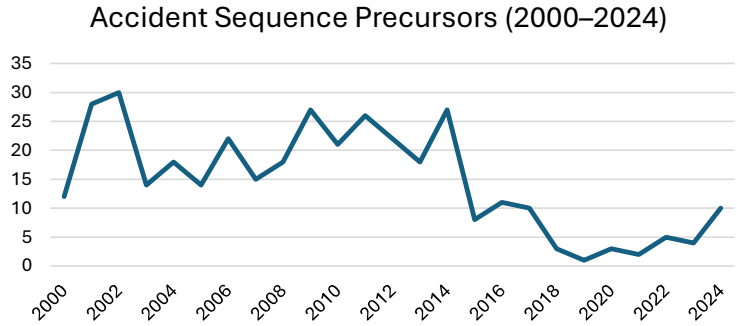
Comprehensive Review of the ROP Baseline Inspection Program

- SRM-SECY-25-0045: "Regarding the upcoming comprehensive review of the ROP, the staff should use data to provide a level of confidence that any reductions to inspections will be well-substantiated, targeted adjustments that will still result in processes that identify and resolve any declines in safety- or security-related performance as early as possible."

ROP vs. Industry Performance

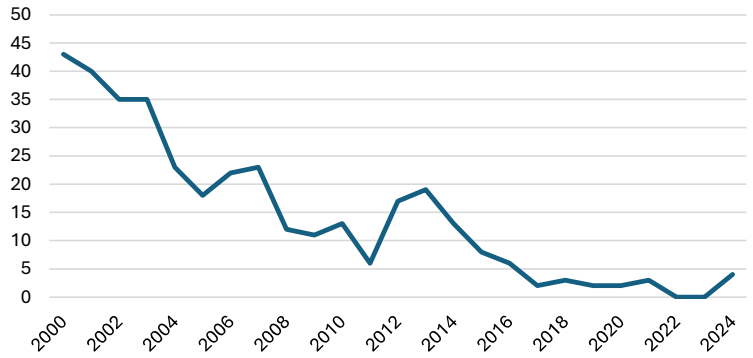
- ROP Inspection Hours
  - 2000: 2,165 hours
  - 2024: 2,018 hours
- Reactor Scrams
  - 2000–2004 Average: 92
  - 2020–2024 Average: 42
- Accident Sequence Precursor Events
  - 2000–2004 Average: 17
  - 2020–2024 Average: 5





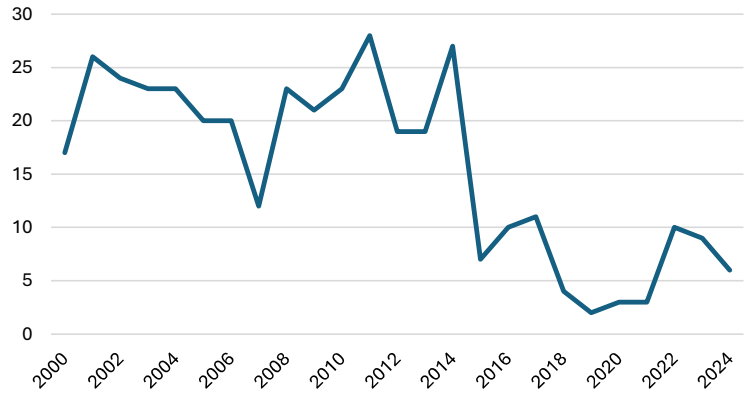
ROP vs. Industry Performance (cont.)

Greater-than-Green Performance Indicators (2000–2024)



2000–2004 Average: 35
2020–2024 Average: 2

Greater-than-Green Findings (2000–2024)



2000–2004 Average: 23
2000–2024 Average: 6

Current Work to Revise the ROP Baseline Inspection Program

- SECY-26-0014: "Recommendations to Revise the Reactor Oversight Process Baseline Inspection Program"

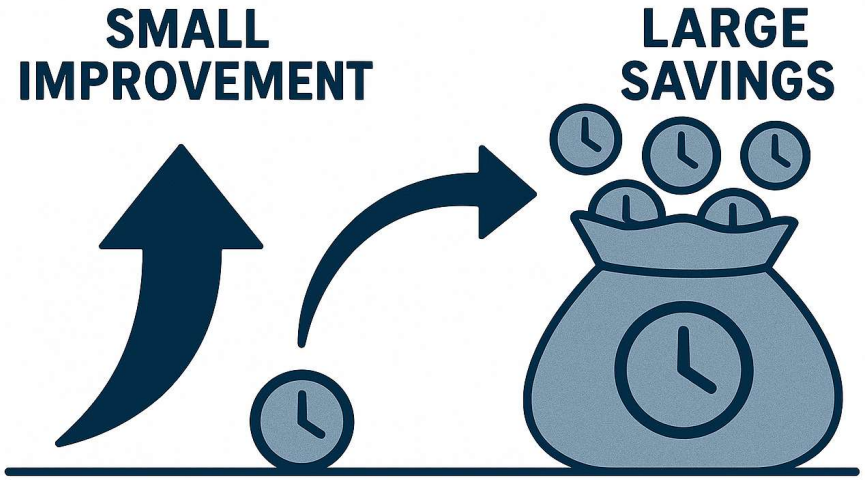
- SECY-26-0015: "Revising the Security Baseline Inspection Program including the Force-on-Force Inspection Program"

Inspection Procedure Series	Current Program Annualized Hours	Proposed Program Annualized Hours	% Change Resource Usage
Reactor Safety Inspection Procedures (IP 71111 Series)	1145	797	-30%
Emergency Preparedness Inspection Procedures (IP 71114 Series)	144	63	-56%
Radiation Protection Inspection Procedures (IP 71124 Series)	115	71	-36%
Security Inspection Procedures (IP 71130 Series)	287	149	-48%
PI Review, PI&R, Event Follow-Up Inspection Procedures	327	165	-49%
TOTAL	2,018	1,245	-38%

Nuclear Materials Oversight and Inspection

Enhancements in Nuclear Materials Oversight and Inspections

- Efficiencies Gained
- Risk-Informed Program Changes
- Report Consistency
- Increased Risk Tolerance in Issue Resolution
- What's Next?



Small Improvements Equal Resource Savings

- Centralization of inspection data for efficient inspection and travel planning
- Optional inspection entrance and exit meetings
- Hybrid inspections
- Small inspection resource estimate changes
- Optional Licensee Performance Review public meetings for good performers

Risk-Informed, Performance Based Inspection Program Changes

Decommissioning and Low-Level Waste

- Developed criteria to change inspection frequency based on site's scheduled safety significant activities

Fuel Facilities

- Calendar year 2026 pilot program to adjust inspection hours based on changes in facility risk and performance
- Consolidate IPs and eliminate duplicative plant modification inspections

Materials Inspection Program

- Revise inspection frequency using the NRC's risk-informed decision-making principles

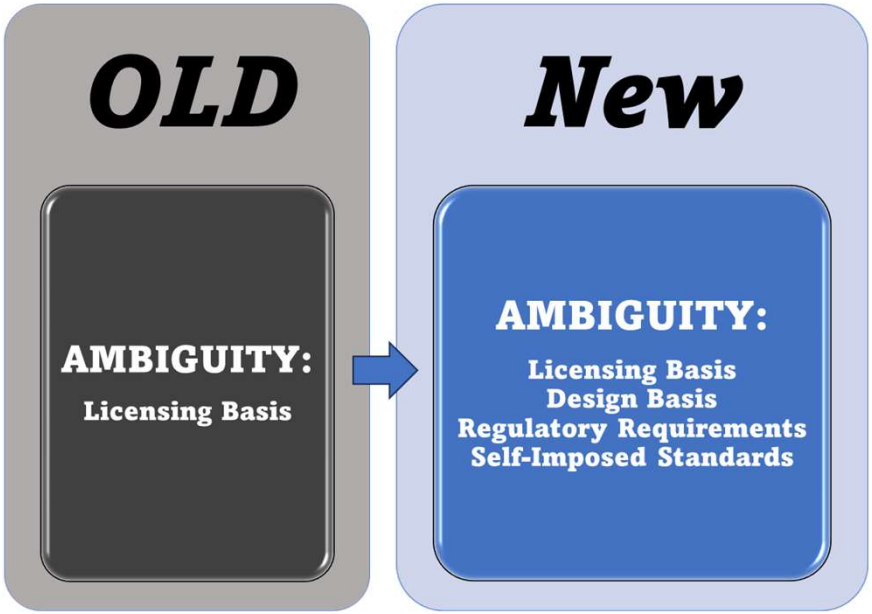
Spent Fuel Storage and Transportation

- Eliminate inspections of not-important-to-safety independent spent fuel storage installation foundation inspections

Materials Inspection Report Consistency (It only took 20 years!)

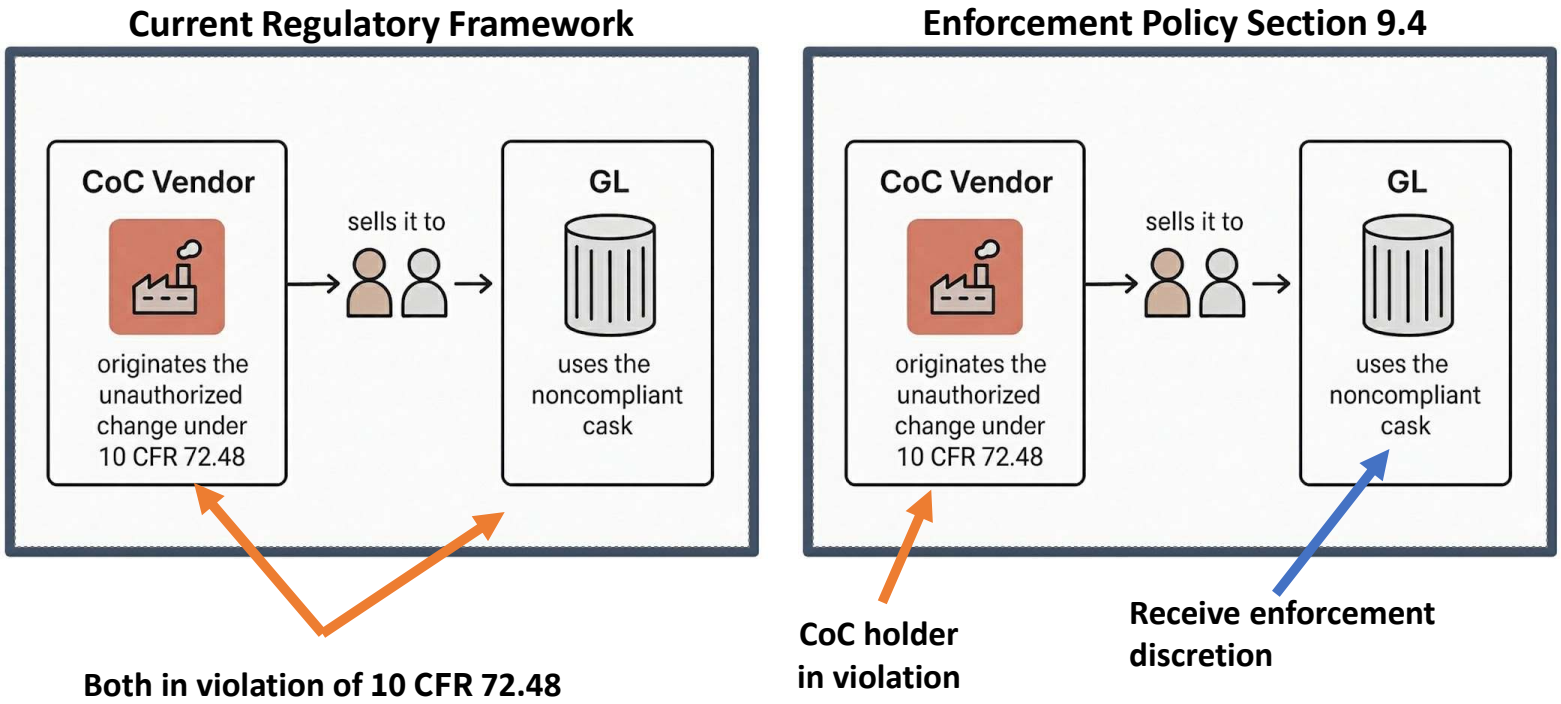
- **Align with Modern Inspection Practices—**Update IMC 0610 to reflect risk-informed inspections, enforcement guidance, best practices for entrance/exit meetings, and Integrated Materials Performance Evaluation Program evaluation criteria.
- **Streamline Documentation—**Use a more efficient and template-driven approach to inspections and allow flexibility in documenting lower significant enforcement actions.
- **Lay the Groundwork for Automation—**Treat this revision as a stepping stone for future efficiencies when transitioning to automated tools.
- **Standard Citations—**Develop a centralized NMSS database for certain Severity Level IV citations for efficient documentation.

VLSSIR, Expanded: Faster Screens, Smarter Focus



- NMSS applied expanded VLSSIR process to unresolved items in calendar year 2025:
  - Good example of this expanded use was documented in the 2025 Homestake Mining Company Inspection Report (ML25230A008)
  - Ambiguity in licensing basis on the Homestake's methodology to calculate annual radon flux and using acceptable radon factors for annual public dose estimates

Interim Enforcement Policy for Enforcement Discretion for General Licensee (GL) Adoption of Certificate of Compliance (CoC) Holder-Generated Changes under 10 CFR 72.48



NMSS Path to Inspection Excellence

- Rebaseline inspection programs to continue focus on issues of higher safety significance.
- Improve issue screening and enforcement processes for quicker decision-making.
- Automate inspection reporting and tracking.

Right-Sizing Agency Oversight and Inspection

Tim Riti
Director, Regulatory Affairs
Nuclear Energy Institute

- Reactor Oversight Process (ROP) Task Force Overview
- NEI Response to ADVANCE Act Section 507 & Executive Order (EO) 14300
- Looking Ahead

Reactor Oversight Process (ROP) Task Force Overview

- Focal point for industry interface with the NRC on ROP implementation & proposed changes
- Monitors implementation of the ROP across the operating fleet
- Shares inspection lessons learned with the industry and NRC
- Coordinates revisions to performance indicator implementation guidance (NEI 99-02) and frequently asked questions

NEI Response to ADVANCE Act Section 507 & EO 14300

NEI NUCLEAR ENERGY INSTITUTE | 1201 F Street NW · Suite 1100, Washington, DC 20004, nei.org | Andrew N. Mauer, Senior Director, Regulatory Affairs | Phone: 202.739.8018, Email: anm@nei.org

October 28, 2024

Mr. Michael F. King
Special Assistant for ADVANCE Act Implementation
Office of the Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, DC 20555-000

Subject: NEI Input on Improvements to Licensing and Oversight Programs

Project Number: 689

Dear Mr. King,

As you know, the need for carbon-free, reliable energy in the United States and worldwide has skyrocketed. The recently passed bipartisan legislation known as the ADVANCE Act[1] will help nuclear energy play a key role in the Nation's effort to achieve its climate and energy security goals. Provisions of the ADVANCE Act will bolster U.S. international competitiveness, accelerate the domestic deployment of innovative advanced nuclear technologies, promote greater efficiency and timeliness in the U.S. Nuclear Regulatory Commission's (NRC) processes and modernize the oversight and licensing of the operating fleet of reactors. We appreciate that the NRC has already taken steps to respond to the requirements of the ADVANCE Act, including forming internal teams to address provisions of the ADVANCE Act, establishing a web page to communicate with stakeholders[2], and having public meetings to engage external stakeholders.

To assist the NRC in obtaining feedback from the industry, the Nuclear Energy Institute (NEI)[3] has worked with our members to develop recommendations for the NRC's consideration with respect to Sections 505 and 507 of the ADVANCE Act related to licensing efficiency and improving oversight and inspection programs. Over-arching recommendations are summarized below, and additional details and recommendations related to Sections 505 and 507 are provided in Attachments 1 and 2 respectively. While recommendations may be categorized in the attachment within specific business lines, we encourage the NRC to consider each of these recommendations across NRC business lines, where possible.

The NRC's regulatory processes must be efficient and timely to accommodate the significant increase in workload expected based on NEI's recent Future of Nuclear Power 2024 Survey[4] stemming from

[1] The "Accelerating Deployment Of Versatile, Advanced Nuclear For Clean Energy Act Of 2024", (ADVANCE Act), full text available at
[2] https://www.nrc.gov/about-nrc/governing-laws/advance-act.html
[3] The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect and engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations involved in the nuclear energy industry.
[4] https://www.nei.org/resources/reports-briefs/the-future-of-nuclear-power-2024-survey

POWERING OUR CLEAN ENERGY FUTURE

ML24302A311

39 recommendations specific to oversight & inspection

- Baseline inspection efficiencies
- Reduce documentation
- Reevaluate cross-cutting issues program
- Efficient dispositioning of very low safety significant issues

ML25213A112

Nearly 100 recommendations to over 1000 regulations, policies, and supporting guidance

- Approximately 30 recommendations specific to oversight & inspection
  - Improved risk informed performance-based ROP Framework
  - Value based inspections
  - Eliminate/reduce low value work

Eliminate areas of inspection duplication and focus on the areas that matter the most

Looking Ahead

- Complete assessment of ROP performance indicators
- Support public discussions on other areas of ROP reform
- Prepare to provide comments during the NRC's wholesale review of regulations
- Share ROP implementation feedback and lessons learned

DPC RECOMMENDATIONS THROUGH THE YEARS

PROGRESS AT LAST

Michael Callahan,
Decommissioning Plant Coalition

"RISK INFORMING PART 72"

- NRC undertakes effort post-Fukushima. Commissioner Apostalakas' suggestion to look beyond reactor risk led to NMSS' look at Part 72.
- Key meeting on January 15, 2015 ("Phase 2: Risk Informing Part 72")
- Presented chart showing storage risk in the 10^{-12} to 10^{-13} range.
- Slide has never , to our knowledge, ever been presented again.
- Criticized by NRC staff members as "not believable" , misleading, and having too small a sample size.

WHAT WE KNOW

- No prompt measurable changes in regulation or inspection surfaced from that session.
- We've seen episodes of risk not fully factored into regulatory or inspection activities. Examples available in our comments on E.O. 14300 and the Advance Act efforts, etc.).
- The risks are low; very, very low throughout decommissioning and spent fuel storage (esp. once fuel is in dry cask storage).
- We need an articulation (not a definition or a PRA) from NRC on the risks of the ISFSI mission.
- We need to fulfill the promise of "Phase 2" now that we're 11 years beyond that meeting.

ALONG THE WAY

- Spent Fuel Storage and Transportation Scoping and Implementation Plan for Risk-Informing Regulatory Activities.
- Proposed Risk Management Regulatory Framework (RMRF) Sept 1, 2015 teleconference. Subsequently, the Commission decided to instead allow the staff to implement risk-informed approaches within NRC program areas (SRM in March 2016).
- July 26, 2016 Commission Meeting. DPC Executive spokesperson Wayne Norton emphasized that the regulatory program is more complicated than needed and needs risk informing.

ALONG THE WAY - (CONT'D)

- January 15, 2019 NMSS memo, "KEY PRINCIPLES FOR NUCLEAR MATERIAL SAFETY AND SAFEGUARDS REVIEWS." Directed staff to focus on most safety significant portions of requests, system performance rather than component performance, and safety improvements of new technologies.

- March 18, 2020 memo, INDEPENDENT SPENT FUEL STORAGE INSTALLATION INSPECTION PROGRAM ENHANCEMENT INITIATIVE ASSESSMENT AND RECOMMENDATIONS.

ALONG THE WAY (CONT'D)

- COVID-19 exemptions.
- Draft Reactor Decommissioning Financial Assurance Working Group Final Report. We were able to interact to improve.
- VLSSIR Process.

WHERE WE ARE

- We are anticipating key changes to the the approaches, the regulations, and inspections via the realistic assessment of risk in the coming rule packages that impact decommissioning and ISFSI storage.
- We were encouraged by the Showcase session DFM held on February 19.
- We'll need to carefully review the rule packages and the associated guidance that will be coming forward.

DPC RECOMMENDATIONS, LARGE & SMALL

- The annual Spent Nuclear Fuel inventory/calculations reporting and the report for transuranic decay for fuel in dry storage seem unproductive once the material is up in a cask. If calculation spreadsheets are run out for many years, nothing is going to ever change by a measure that means anything of significance for material in dry storage.
- Radiological effluent annual reports-especially for sites that are fully in dry storage and have zero radioactive liquid or gaseous effluent-can be eliminated.

DPC RECCOMENDATIONS

- Grant credit for performance based on inspection results at decommissioning facilities and ISFSIs; when a site has had two inspections that are, “clean,” that is do not result in anything other than non-cited violations, then the next inspection is “skipped”. If violations are found in a specific area, then the next inspection should be confined to the module that encompasses that finding but the remaining inspections “skipped.” Thereon, an inspection with no violations will lead to “skipping” the next, etc. (And, when a site is in a period of little activity, no inspections should be scheduled. Also, facilities in SAFESTOR should have a sharply reduced level of inspection.)

DPC RECOMMENDATIONS

- 10 CFR 72.48 must be revised to allow flexibility in changes to the storage systems and site operations without prior NRC approval.
- The Commission should require that violations of such minimal safety significance and lead to a non-cited violation and/or enforcement discretion (and issuance of an Enforcement Guidance Memorandum) must first trigger a staff review of whether the regulatory provision is needed for decommissioning or ISFSI only sites.

WHERE WE NEED TO GO

- This arena of Agency Inspection and Licensing for Decommissioning and ISFSI Storage are the most fertile for renovation and reductions of NRC effort – if we will recognize the very, very low level of risk in our activities.
- We remain optimistic that we can build upon this latest era of enthusiasm for this task and make real and lasting improvements.
- NRC – please prove us right.

The DPC was established in 2001 out of the recognition that the overwhelming attention of the regulator, the industry, and policy makers would be focused on the operating fleet and provides a forum for the identification of federal policy and regulatory issues of unique or special concern to decommissioning civilian nuclear facilities. Since its inception, plants that have been represented in the work of the DPC include charter members Dairyland (WI), Connecticut Yankee (CT), Rancho Seco (CA), Maine Yankee (ME), Yankee Rowe, MA), Humboldt Bay (CA), and joined by Big Rock(MI), Crystal River(FL), San Onofre (CA), Vermont Yankee (VT), Zion (IL), Kewaunee (WI), Trojan (OR), and Ft. Calhoun (NE). Other Entergy, Exelon, and PG&E plants have participated via their specific sites' memberships.

Our primary goal remains to hasten the day when the spent fuel stored on-site will be successfully removed and no longer our companies' liability. The importance of that goal cannot be overstated. Several of our companies are simply awaiting the fulfillment of that goal to go out of business. Others find that spent fuel and GTCC storage consume up to 20% and more of corporate attention and resources, a disparate amount considering that these facilities no longer produce revenue. While the fuel remains on-site, we are also committed to engaging in activities that directly affect these sites.

Questions?