DECOMMISSIONING FROM THE FRONT LINES
HISTORY, EXPERIENCE, AND THE PATH FORWARD

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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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