

What's Currently Wrong with Decommissioning

1.) No adequate independent, transparent fiscal oversight required by NRC, despite NRC's assertion that safety costs money, and money is necessary for proper decommissioning

- GAO and other oversight organizations and NGOs maintain the NRC uses a faulty formula for calculating and collecting funds for reactor decommissioning, guaranteeing their underfunding.
- NRC does not require entities conducting decommissioning to hire an auditor or conduct annual audits made available for public review, making the funds susceptible to widespread fraud, theft and inefficiency.
- NRC does not explicitly require entities conducting decommissioning to adhere to U.S. General Accounting Principles and Practices.

2.) No adequate independent, transparent project oversight required by NRC

- In conjunction with point 1.2 above, no means are in place to independently verify that funds are being used exclusively for the decommissioning purposes intended; and that work billed for actually is taking place.

3.) NRC refuses to adopt enhanced "hardened on-site storage" (HOSS) storage methods for interim storage of high-level radioactive waste (HLRW)

- HOSS is used successfully in other nations, and has been advocated since 2002 by over 100 safe-energy NGOs in the U.S.
- The current method of dry-cask storage, while allegedly robust, is more vulnerable to natural disasters and intentional sabotage and mishaps than if HLRW were stored using HOSS.

4.) NRC cannot or refuses to demonstrate that proper storage casks or emergency response equipment actually exists for responsible HLRW management

- Current dry-cask designs in use have recently had quality assurance, physical performance and integrity, and reparability called into question.
- NRC refuses to adopt requirements for remote sensor monitoring systems, and onsite ability to repair casks if necessary.
- NRC cannot verify and refuses to track or state whether the actual machinery and devices it requires for decommissioning actually exists or is available in the Real World.
- NRC permits destruction of the reactor wet spent-fuel pools, required to transfer waste safely into dry casks underwater, without demonstrating the physical existence of safe alternative transfer machines in case of emergencies with the dry casks.

5.) Despite the federal government renegeing on its mandated 1997 obligation to take HLRW from reactor sites and open a permanent disposal repository:

- No financial "make whole" programs exist to compensate the reactor communities for enormous economic damage caused by DOE's default resulting in the communities becoming *de facto* HLRW storage sites.
- No pre-closure "just transition" financial plans or programs are in place or required for communities to avoid the sudden economic trauma of abrupt reactor closure, and its effects from loss of tax base and disruption of essential public services, as well as the local economy.

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