

**Status of Diablo Canyon Decommissioning Engagement Panel Strategic Vision
Recommendations on Spent Nuclear Fuel Storage and Management
April 2022**

Strategic Vision Recommendation	Status	Notes	Responsible Party
Risk Analysis			
Recommend that PG&E, after consultation with the California Energy Commission (CEC) regarding the scope, hire a risk assessment consultant before the end of 2019 to complete an independent risk assessment of a range of alternatives for offloading spent nuclear fuel	Complete	Report is published for public use	PG&E
Recommend that PG&E be transparent in any decision-making regarding the offloading of spent nuclear fuel and any new dry cask storage system, including collaboration with the CEC, DCISC, risk analysis consultants and stakeholders, in addition to the NRC	Ongoing	System announced in April 2022	PG&E
Dry Cask Storage System			
Recommend that PG&E begin the RFP process before the end of 2019 for a new dry cask storage system which could support a more rapid offload of spent nuclear fuel from the spent fuel pools to dry cask storage, if an independent risk assessment deems this to be feasible and safe	Complete	RFP issued in 2020. RFP technical specification reviewed independently by the CEC. CEC feedback incorporated into RFP.	PG&E
Recommend that PG&E thoroughly investigate and research all potential dry cask storage system designs in order to determine the best site-specific system that takes into consideration the unique seismic risks at DCCP and the fact that the length of time the spent nuclear fuel and GTCC waste will be stored on site cannot be estimated at this date	Complete	All entities with a viable US licensing and manufacturing capacity participated in RFP process.	PG&E
Recommend that PG&E select a dry cask fuel storage system that uses advances in the materials, manufacturing and engineering of dry cask storage systems in order to improve the shielding and confinement of spent nuclear fuel and the heat capacity of the canisters	Complete	The specification requires use of a robust list of the latest established regulations, standards, guidance documents, and operating experience from a variety of mature sources (Appendix C). Specification Sections 6 and 7 address materials and fabrication requirements, respectively.	PG&E
Recommend that PG&E select a dry cask storage system that would allow for 24-hour radiation	Complete	The technical approach to radiation monitoring fuel at	PG&E

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monitoring, full inspection capability, be fully retrievable, have the capability to either repackage or repair a damaged cask and be licensed for transportation		DCPP will be a perimeter system which will envelope the current and future system. This radiation monitoring system was included in the 2021 NDCTP. As shown in specification Sections 5.1.1 and 5.4.2, the dry cask storage system is required to be fully inspectable and retrievable with a canister licensed for both storage and transportation.	
Recommend that the new dry cask system minimize dose rates to workers to the greatest extent achievable	Complete	As shown in specification Section 5.3.1.12, maintaining dose to workers is required to be as low as reasonably achievable (ALARA).	PG&E
Dry Cask Loading			
Recommend that all PG&E staff and any outside contractors involved with cask loading receive ample pre-operational training and testing, based on lessons learned in other ISFSIs, prior to implementation of any new dry cask storage system	In process	This is the current practice and will continue. As shown in specification Sections 3.6.3 and 3.6.5, worker training is required to be completed prior to the start of a loading campaign and must include lessons learned from prior experiences.	PG&E
Recommend that any outside contractors involved with cask loading have experience with the system and be fully trained, vetted and adequately supervised	In process	PG&E's contract with the dry cask storage vendor delineates the experience required, supervision, and PG&E oversight.	PG&E
Aging Management Program			
Recommend that PG&E develop an Aging Management Program (AMP) for the ISFSI as soon as practicable, possibly before such program is required to be prepared	In process	AMPs were developed and submitted to the NRC for review and approval in the DC ISFSI License Renewal Application, dated March 9, 2022. AMPs are in addition to the existing inspection and maintenance programs.	PG&E / NRC
Recommend that PG&E conduct a future feasibility assessment of the benefits and costs of enclosing the existing ISFSI, including a climate-controlled environment alternative	No status		PG&E
Recommend that if stress corrosion cracks or other degradation is found, this should be	Ongoing	As part of the DC ISFSI License Renewal Application, dated	PG&E / NRC

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identified early and appropriate corrective actions taken immediately, which may include enclosing the ISFSI in a structure, and any such experience and information be shared transparently with regulators, other ISFSI operators and the community		March 9, 2022, an AMP was developed to periodically monitor for stress corrosion cracking and address it if found through the Corrective Action Program. This AMP is currently under the NRC review and approval process.	
Recommend that PG&E continue to participate in research and collect data on the potential degradation of canisters used in the dry cask storage system and make any results available to regulators, other ISFSI operators and the public	Ongoing	As part of the DC ISFSI License Renewal Application, dated March 9, 2022, AMPs were developed that will require PG&E to conduct periodic reviews of documentation to determine whether the AMPs are effectively managing the effects of aging. These AMPs are currently under the NRC review and approval process.	PG&E
Recommend that PG&E have an onsite facility or other means in place to deal with potential leaks from spent fuel canisters and the ability to repackage the spent fuel if necessary	In process		PG&E
Security			
Recommend that PG&E accurately budget for, and the CPUC support the funding of, comprehensive security measures for all phases of decommissioning	Ongoing	2018 NDCTP provided such funding	PG&E / CPUC
Recommend that ongoing training of the security force, security drills and coordination with local law enforcement continue to exceed the minimum required by the NRC in order to maintain a highly trained, site specific security force	Ongoing	PG&E exceeds minimum security requirements and successfully passes its force-on-force drills evaluated by the NRC.	PG&E
Recommend that PG&E transfer spent nuclear fuel from DCPD as soon as either a CISF or permanent repository is developed in order to save ratepayers the cost of indefinite security	N/A	No licensed facility is constructed yet to receive fuel	PG&E
Offsite Repository for Spent Nuclear Fuel			
Recommend that the spent nuclear fuel and GTCC waste stored in the DCPD ISFSI be transported to a permanent government repository located offsite as soon as possible, presuming a safe transportation method for such movement is developed and followed	N/A	No licensed facility is constructed yet to receive fuel or GTCC waste	PG&E

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Recommend that PG&E move the spent nuclear fuel and GTCC waste stored in the DCPD ISFSI to a Consolidated Interim Storage Facility (if a permanent federal repository is not available) as soon as such site becomes operational, presuming a safe transportation method for movement is developed and followed	N/A	No licensed facility is constructed yet to receive fuel or GTCC waste	PG&E
Recommend the spent nuclear fuel and GTCC waste, if transported by truck, avoid times of peak traffic through Avila Beach and other impacted communities	N/A	No licensed facility is constructed yet to receive fuel or GTCC waste	PG&E
Recommend that transfer of ownership of spent nuclear fuel be formalized prior to any shipment from the DCPD to an off-site storage facility	N/A	No licensed facility is constructed yet to receive fuel	PG&E / NRC
Recommend that PG&E advocate for the establishment of an offsite storage solution, either a Consolidated Interim Storage Facility or a Permanent Federal Repository	Ongoing	PG&E supports both CIS and Yucca Mt.	PG&E