

Waste Management



- Plant Background
- Planning
- Characterization
- Primary System Decontamination & Hot Spot Reduction
- Spent Fuel Management
- Dismantlement & Demolition
- Waste Treatment & Disposal Options in the US
- Waste Disposition



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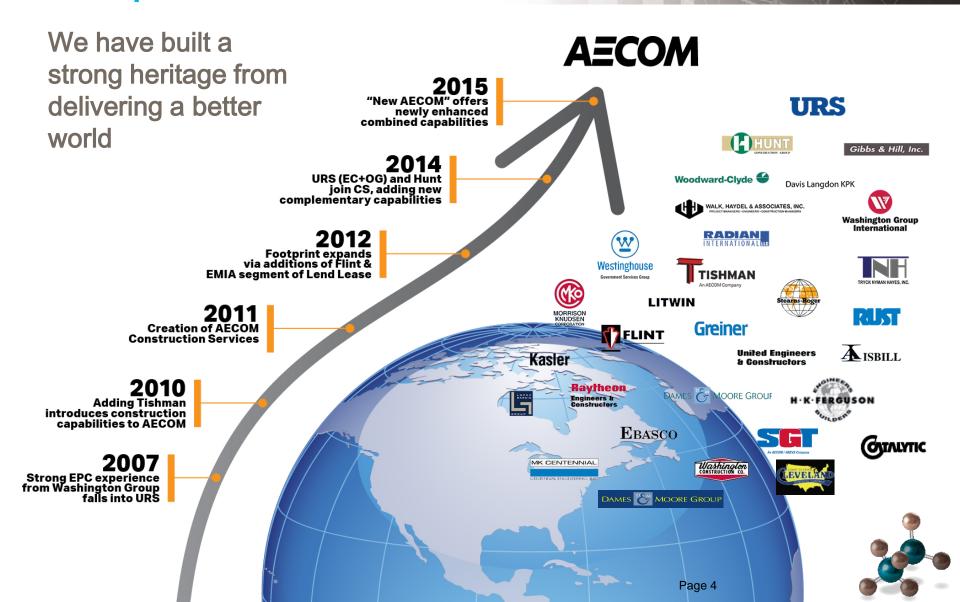
Acquisition & Integration Financial Strength \$18B in annual revenue Over 50 companies integrated since 1990 Greater than \$40B backlog Experience in nuclear power plant acquisitions Ability to provide appropriate guarantees and reach Experience in transition and management of nuclear sites agreement on terms with client and stakeholders (largest in U.S. DOE complex) Board level initiative / reorganizing to grow decommissioning business Management & Operational Capability to D&D and Technical Expertise take over Site License Experience as a non-utility licensed operator of a 60 years of continuous involvement in the nuclear power nuclear facility for decommissioning purposes industry 30+ years of nuclear decommissioning experience Proven ability to manage multiple D&D projects simultaneously Over 1,650 facilities decommissioned (including 20+ production / test reactors) Managed multi-billion D&D budgets in 2016 In-depth knowledge and experience with the NRC Have incorporated 3 Yankees leadership experience in D&D and ISFSI-only operations Local regulatory knowledge Expertise with plant decommissioning and used fuel stewardship Knowledge of plant policies, procedures and expectations



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The Heritage & Evolution of Legacy Companies

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Connecticut Yankee (CY) PWR Plant Data



- Construction Permit Issued: May 26, 1964
- Operating License Issued: December 27, 1974
- Commercial Operation: January 1, 1968
- Ceased Operations: December 9, 1996
- Licensed Capacity: 1825 MWth / 560 MWe
- NSS Supplier: Westinghouse 4 Loop PWR
- AE/Constructor: Stone & Webster
- License: DPR-61 (Docket No. 50-213, 72-39)
- Site Size: 525 Acres (2.1 x 10⁶ m²)



CY - Pre-Decommissioning Plant Photo





Connecticut Yankee Plant Site following Demolition Activities







Connecticut Yankee – Aerial View Today (with ISFSI on right)

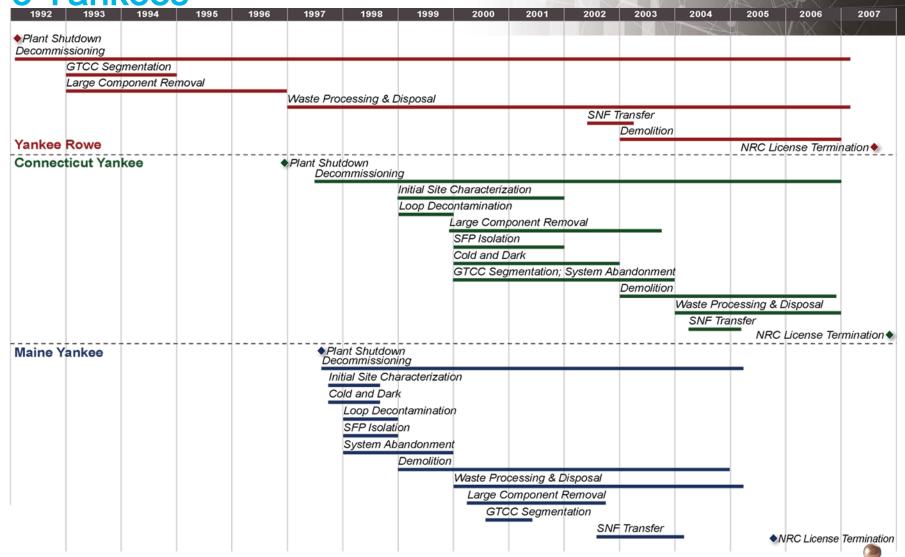




ISFSI: Independent Spent Fuel Storage Facility

Decommissioning Schedules 3 Yankees





CY – Regulatory Issues during Decommissioning



Federal Regulations

- New NRC regulations for Decommissioning
- Generic Environmental Impact Statements for decommissioning projects

License Termination

- Creation of Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM)
- Memorandum of Understanding between NRC and EPA

Regulatory Challenges

- ISFSI encountered local opposition → Required litigation for resolution
- Groundwater contamination was discovered → Required extensive radiological and non-radiological cleanup
- State Release Criteria was stricter than the NRC limit of 0.25 mSv/year



CY – Other Key Takeaways



- Involve all stakeholders early and continuously
 - Agree on end state criteria → Drives the project strategy decisions
 - Obtain approval from stakeholders (NRC, EPA, and State) on the end state as early as possible

- NRC is not the only regulator
 - In the US, States have local jurisdiction of D&D sites
 - EPA regulations for chemical and industrial cleanup (RCRA/TSCA)
 - EPA and States have more stringent radiological release criteria





Connecticut Yankee Waste Management Planning



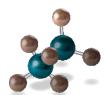
- Waste Management Planning is integrated into the Plant's overall Decommissioning Planning
- Key Components for Decommissioning & WM Planning
 - Detailed Facility and Systems Characterization
 - Before and after shutdown
 - Activation Analysis
- Characterization data drives the development of:
 - Waste Management Plans
 - Selection of Decontamination Method
 - For example, Primary System Full Scale Decontamination
 - Dismantlement and Demolition Methods



CY - Waste Management Planning



- Other Key Factors that impact Waste Management include:
 - Spent Fuel Management
 - Establishment of End State Conditions
 - Can you "abandon" certain structures and systems in place if they meet release criteria?
 - Can you rubblize and bury certain concrete products on site as fill?
 - Site-Specific Cost Estimate & Schedule
 - Cold & Dark Strategy
 - Flush & Drain Systems





Site Characterization



- Primary Goal: Obtain enough understanding of the location and concentration of contaminants on the site to make project strategy decisions
 - Confirm the extent of known contaminates
 - Identify <u>unknown</u> contaminates at the Site → Characterization strategy should be developed to enable this
- Thorough characterization is critical for:
 - Defining the project scope
 - Bounding project costs and risks
- Establishing a sound basis for planning
- Validating compliance with the D&D Generic Environmental Impact Statement



Site Characterization



Detailed activation analysis

- RPV
- RPV internals
- Biological shield
- Etc.

Identified non-radioactive hazardous materials

- Asbestos
- Lead
- Mercury
- Etc.

Historical assessment of all known surveys and sample documentation

Site Characterization

Detailed radiological surveys of area and systems inside of the RCA Discussion of any known leaks or prior spills with plant personnel

Radiological surveys, soil sampling and ground water sampling



Connecticut Yankee Characterization



- CY's characterization was not initially comprehensive
- The characterization was enhanced in 2003 before major dismantling
- Extensive Cs-137 and Sr-90 groundwater contamination from the tank farm was identified late in the process





Significant unplanned soil remediation efforts





Primary System Decontamination CY and Maine Yankee (MY)



Connecticut Yankee	Maine Yankee
Siemens CORD D UV	EPRI Decontamination for Decommissioning (DFD)
DF 15.9	DF 31.5
 Used installed plant equipment Improper maintenance following permanent shutdown → Leaks → Decon halted → Reduced DF 	Generated higher waste volumes compared to CORD D UV

CORD D UV: Chemical Oxidation Reduction Decontamination, Decommissioning, Ultra Violet

EPRI: Electric Power Research Institute

DF: Decontamination Factor



CY Primary System Decon Lessons Learned



Purpose of Primary System Decontamination	Important Considerations
Reduce dose to plant personnel	 Has Co-60 already decayed since shutdown? Are the cost savings of personnel dose greater than the cost of performing decontamination?
Reduce volume of higher- level solid waste	 Will decontamination reduce the waste classification of the Primary System? Are the savings from reduced disposal cost greater than the cost of performing decontamination? Will the decontamination process produce Level 1 waste (Class C or GTCC in US)?

- Data for deciding whether to perform Primary System Decontamination comes from the comprehensive Site Characterization.
 - If data support performing decontamination, start the process as soon as possible
- If using plant installed equipment, this equipment must be fully maintained until after completion of the decontamination process.

Connecticut Yankee – Hot Spot Reduction during D&D / WM Ops



- In addition to the initial primary system full scale decontamination, CY utilized a gamma camera to survey different plant areas and determine hot spots in those areas that would impact worker personnel dose
- These hot spots were identified and removed independent of other operations





Spent Fuel Management



- US Department of Energy (DOE) was assigned responsibility to site, build, and operate a deep geological repository for the disposal of High Level Waste and spent nuclear fuel
 - There are no spent fuel reprocessing facilities in the US
- Repository Funding: Fee from electric utilities on nuclear-generated electricity
- DOE executed standard contracts with the nuclear utilities for the disposition of their spent fuel
 - DOE was expected to start accepting fuel in 1998
- DOE was unable to open the facility → Breached contract for spent fuel disposition
 - Many utilities have sued or settled with the US Government to pay for spent fuel management
 - 25% of US spent fuel inventory is at dry storage facilities (ISFSI)



ISFSI Spent Fuel Management @ 3 Yankees



- Centralized common corporate management for all 3 ISFSI facilities
 - Yankee Rowe
 - Connecticut Yankee
 - Maine Yankee
- Each site has limited management personnel and security staffing
- Common services are performed by common resources
 - Licensing
 - Engineering
 - Project support
 - Financial services, etc.
- Sites implement a "firehouse" approach: security staff also performs monitoring and maintenance of the facilities on a rotating basis



Connecticut Yankee Spent Fuel and GTCC Waste



- Canister Type: NAC Multi-Purpose Container (MPC)
- USNRC Docket/Certificate of Compliance: 72-1025
- Number of Fuel Assemblies: 1,019 (1,825 MWth Westinghouse fuel)
- Number of Fuel Assemblies per Canister: 24 26
- Number of Canisters of Spent Fuel: 40
- Number of Canisters of HLW: 3
 - GTCC (Level 1 in Japan) RPV internals segmented via ultra-high pressure abrasive water jetting
 - Cut and loaded into 64 fuel assembly sized canisters
- All spent fuel is currently stored on the ISFSI pad at CY



Vertical Concrete Cask (VCC)

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Spent Nuclear Fuel Loading

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 Dependent on fuel utilization, fuel assemblies may require cooling in the spent fuel pool for 5 to 7 years prior to being able to load into dry storage canisters



Connecticut Yankee ISFSI Facility





- Involve stakeholders early in ISFSI siting and spent fuel management operations
- Moving fuel from wet to dry operations has significant impact on decommissioning schedule





Connecticut Yankee – Sequence of Dismantling Operations



- Reactor Pressure Vessel (RPV) and Large Components
 - RPV Internals
 - 4 x Steam Generators and Pressurizer
 - Reactor Coolant Pumps & Motors
 - Primary Loop & Surgical Removal of Contaminated Systems
 - Reactor Pressure Vessel
- Facility Demolition
 - Primary Auxiliary Building / Control Building / Service Building
 - Turbine Building
 - Containment Building
 - Spent Fuel Building
- Soil and Groundwater Remediation Cleanup

Three parallel critical paths

- Fuel transfer to ISFSI and SFPI D&D
- Containment Building D&D
- Tank Farm / PAB remediation and groundwater restoration / monitoring



Connecticut Yankee – Large Component Removal Photos

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- 1. RCP (Reactor Coolant Pump) Removal
- Pressurizer Removal
- 3. S/G Lower Assembly Removal
 - At CY, the steam domes were removed and dispositioned as non-rad waste
- 4. RPV Removal & Packaging





Connecticut Yankee - March 2005

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Connecticut Yankee — August 2005





Connecticut Yankee — January 2006: 85% complete





Connecticut Yankee — August 2006





CY — Significant Dismantling Challenges



- Soil & Groundwater Remediation
 - Continuous pump and treat system used to lower groundwater table to allow soil excavation/removal
 - Large amounts of soil excavated up to 40 feet (12.3 m) deep to bedrock
- Soil Remediation required prior to removal of adjacent structures
 - Required temporary structure support
 - Strategic planning for soil haul routes
 - Multiple shift operations
 - Alternative packaging containers
- Due to the contamination levels under the Tank Farm, soil remediation had to be performed under a containment tent



CY — Soil Excavation and Remediation











Photos show extensive soil excavation and remediation of below grade contaminated areas under the Primary Auxiliary Building (down to bedrock)



CY – Additional Dismantling Challenges

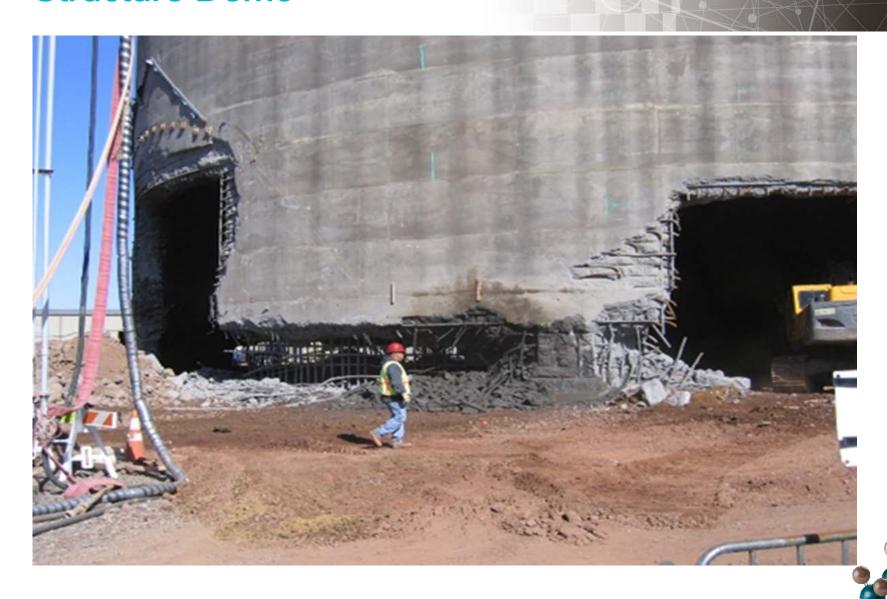


- Containment structure demolition had to begin prior to work completion in the Spent Fuel Building (structures were 15 cm apart)
 - Devised innovative method to remove the containment structure from bottom to top
 - Allowed work to continue safely in the Spent Fuel Building
 - Allowed for safe rubblization of structure for packaging and off-site shipment
 - Method was devised based on experience gained from MY Containment demolition
 - This methodology required significantly less time compared to MY
 - MY used explosive demolition, which requires extensive planning time
- Heavy equipment was used to access and remove contaminated systems
 - Maximized the safer use of yellow iron and equipment for removal instead of manual labor and small tools
- Temporary waste storage areas had to be established to stage outbound waste shipments
- Containment tents were assembled to allow outdoor processing



Connecticut Yankee – Containment Structure Demo





CY – Containment Structure Demolition





CY – Containment Structure Demolition





 AECOM has employed this demolition technique on another containment structure in the USA



Schedule Reduction at CY from Lessons Learned at MY

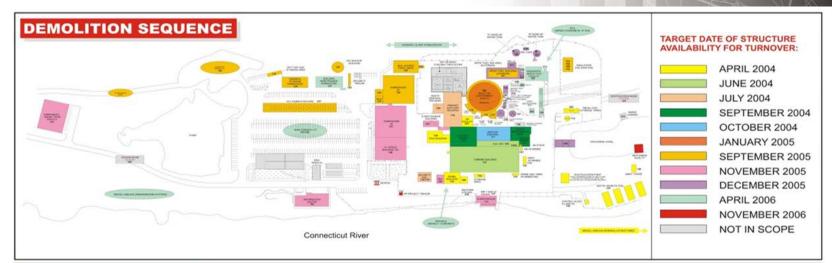


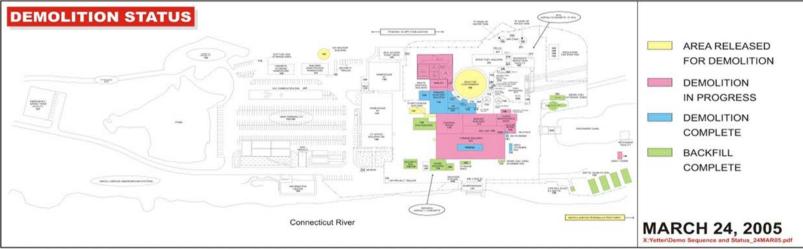
- Demolition Approach: "Rubblization and Direct Disposal"
 - Demolishing a structure with some systems still in place
 - Processing all of the resulting materials as Exempt or BSFR waste (in Japan, Level 3)
- Advantage: Despite higher waste volume, lower overall project cost and reduced risk compared to labor-intensive decontamination and surveying
- Result: 1 year schedule savings for the last 70% of the CY project
- Additional Considerations
 - Shorter schedule → Rate of off-site waste shipments must increase
 - Avoid double handling & processing: integrate packaging where possible directly from the demolition activities



CY Demolition Sequence & Status Map

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CONNECTICUT YANKEE ATOMIC POWER COMPANY
GENERAL ARRANGEMENT DRAWING

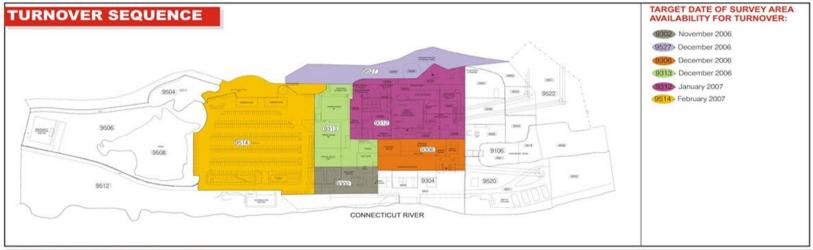


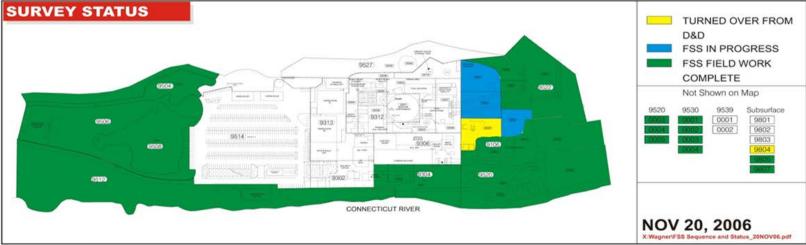




CY Final Status Survey (FSS) Sequence & Status Map











CONNECTICUT YANKEE ATOMIC POWER COMPANY
GENERAL ARRANGEMENT DRAWING

FSS SEQUENCE AND STATUS







Radwaste Classifications In the USA

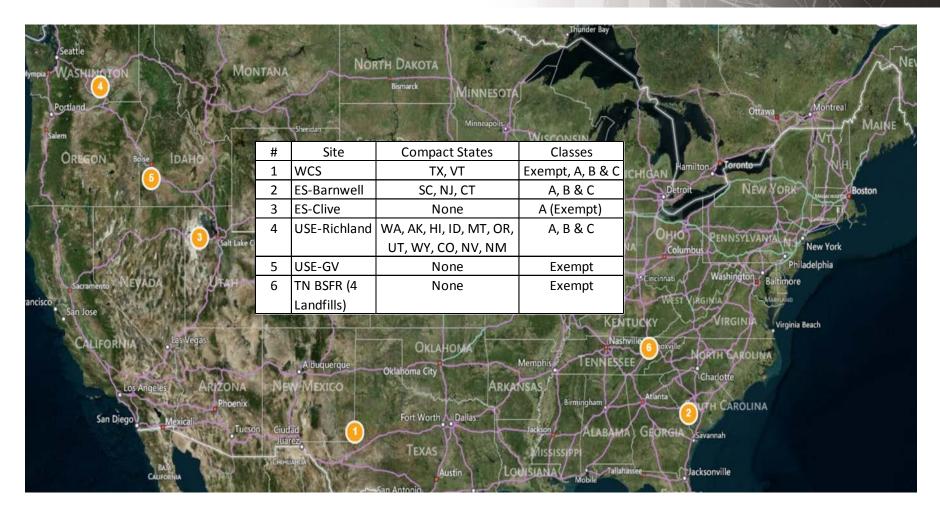


- Exempt / Bulk Survey for Release (BSFR)
 State of Tennessee BSFR Program & NRC 10 CFR 20.2002
 - Allows for disposal in RCRA-type landfills (non-radioactive hazardous waste)
 - Must provide dose analyses showing less than 10 μSv/year to the public
 - Criteria similar to the Level 3 waste category in Japan
- Class A waste (NRC 10 CFR 61.55)
 - Suited for shallow land disposal
 - Usually segregated from other waste types in the disposal site
 - Most waste fits within Level 2 waste category in Japan
- Class B/C waste (NRC 10 CFR 61.55)
 - Waste must meet more rigorous requirements on form to ensure disposal stability
 - Class C waste requires additional measures at the disposal site to prevent inadvertent intrusion
 - Falls between Level 2 and Level 1 waste categories in Japan
- Greater than Class C waste (NRC 10 CFR 61.55)
 - Primarily RPV internals
 - Stored with the spent fuel on ISFSI pads
 - Level 1 waste category in Japan



Location of LLW and Exempt / BSFR Disposal Sites in the USA

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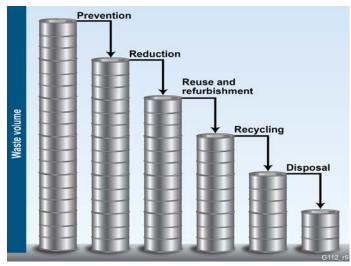


Off-Site Waste Treatment Options in the USA



- Bear Creek Processing Facility
 - Sort and Segregation
 - Compaction: VR 6:1 (Dry Active Waste)
 - Incineration: VR 100:1
 - Metal Melt (Recycling into shield blocks)
- Resin processing (THOR process)
 Erwin, Tennessee
- Other facilities exist for Specialty Wastes with limited potential for use during D&D operations

Classification	Typical Processing	Reason
BSFR Class A	None, direct disposal	Treatment not cost effectiveDisposal options availableCompetition reduces disposal costs
Class B Class C	Off-site Treatment & Volume Reduction	Avoiding high disposal costs justifies treatment

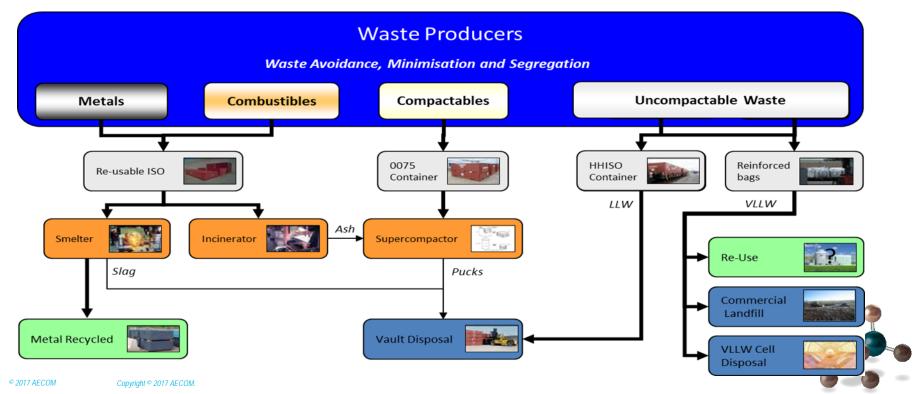




Waste Optimization - UK



- Limited disposal options or direct disposal costs are too high
 - → Processing and treatment becomes cost-effective
 - On-site or at dedicated process and treatment facilities
- In the UK, AECOM manages the country's Low Level Waste Repository (LLWR) and the National LLW Strategy
 - Manage the destiny of all the UK's LLW to minimize the amount disposed in the LLWR
 - Segregation, packaging, transport, recycling, incineration, supercompaction, and metal melt





Connecticut Yankee — Waste Volumes and Categories



Estimated waste masses & volumes from the Connecticut Yankee D&D

	lbs	ft ³	tons	MT	m ³
Contaminated Structures / Soils	374,001,107	3,667,033	187,001	169,647	103,838
Large Components	2,751,812	25,309	1,376	1,248	717
Systems and Components	28,247,081	500,309	14,124	12,813	14,167
Total - Contaminated SSCs	405,000,000	4,192,651	202,500	183,708	118,722

Approximate breakdown by waste classification

	Mass (Metric Tons)							
	Class A	Class A - Shielded	Class B/C	GTCC	Class A / BSFR	Total		
Contaminated Structures / Soils	1,808	-	-	-	167,839	169,647		
Large Components	901	178	33	9	129	1,248		
Systems and Components	3,848	203	-	-	8,762	12,813		
Total - Contaminated SSCs	6,557	380	33	9	176,730	183,708		

~80% to 85% of materials inside of the RCA can meet BSFR / Exempt requirements



CY - General Highlights of Treatment and Disposition



- Segregation of waste → Maximize BSFR sent to Tennessee landfills
- Concrete debris → Size Reduced for lower disposal cost
- Waste sent to Clive Disposal Facility
 - Majority classified as Exempt Quantity (49 CFR 173.436)
 - This waste could also have met requirements to be BSFR material
- Direct burial of large components
- Resins and filters (Class B/C) → Sent to off-site processing
- Debris and soil (Class A) → Direct burial
- Waste water treatment operations in parallel with D&D operations
- Various transportation methods
 - Truck with intermodal container
 - Barge slip
 - No on-site rail available

- Heavy haul transport
- Truck → Transfer to rail

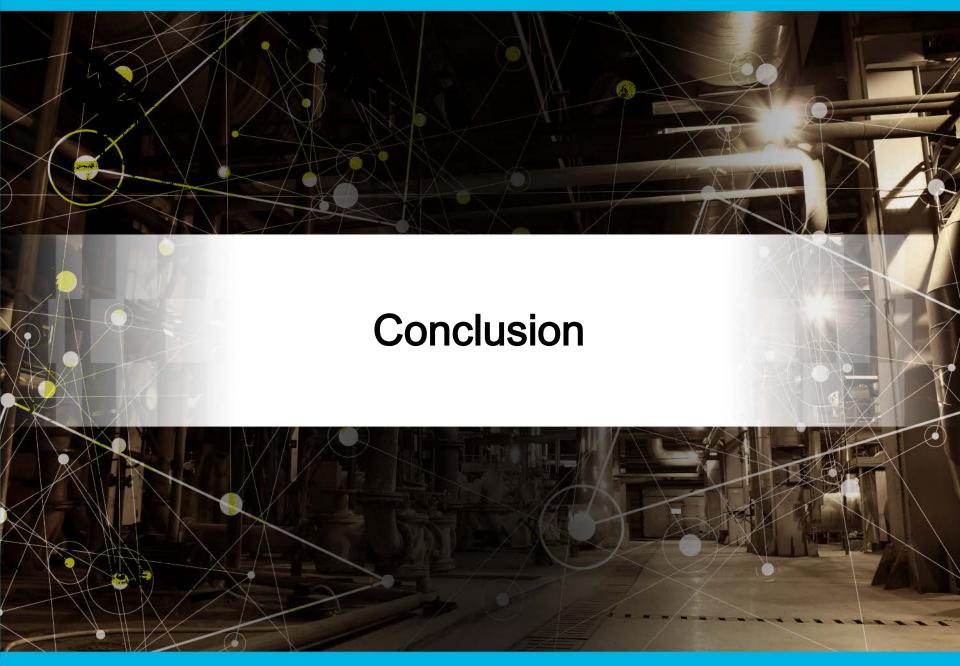


Connecticut Yankee — Waste Management Challenges



- Additional volume of waste generated due to contaminated soil removal
- Off-site waste shipments could not keep up with waste generation from D&D activities
 - CY had no on-site rail connection
 - Waste management had to be horizontally integrated into all site project operations
- Competitive disposal pricing: Connecticut Yankee faced higher prices





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Lessons Learned



- "Rubblization and direct disposal" is generally more cost effective than a "decontaminate and segregate" approach
 - Choice is based on a project specific cost benefit analysis driven by waste disposal options and disposal pricing for each plant
 - AECOM has utilized both approaches in prior D&D work
- 80% or more of the LLW will be classified as BSFR or Exempt
- Waste stream characterization must be accurate, thorough, and early
 - Waste characteristics known prior to waste generation
 - Develop a comprehensive plan for disposition of all waste streams
- Decommissioning → High volume and high production-rate waste disposal
 - Vastly different scale from waste management during operations
 - Relevant experience and processes are critical to success
- Start by fully understanding the existing waste options and create opportunities that may not presently exist
 - For example, dispose of Exempt (Level 3) waste on site if it meets the site release criteria



Lessons Learned



- Decommissioning is often referred to as a "large waste project", but understanding the full scope of the work is critical
 - Reliance on waste experience alone → Missed opportunities for efficiencies and cost savings
- Plan for establishing a Waste Management area on site
 - Waste Handling & Packaging areas require a large dedicated footprint
 - Storage areas can impact background radiation levels in areas planned for characterization or Final Status Surveys
 - Plan the eventual relocation and elimination of the waste handling, packaging, and shipping area
- Waste Management inefficiency can slow the entire project
 - Maintain redundancy in handling equipment (fork trucks, survey instruments, scales, etc.)
 - Perform on-site inspection and repair of shipping containers
 - Maintain at least a rudimentary welding program
 - Set-up a repair area and segregated storage for damaged containers
 - Establish a simple process to visibly identify damaged containers
 - Invest in simple equipment to support safe inspection and survey of shipping containers such as stair towers
 - Develop a simple and robust process for releasing waste shipments from the site



