

ATTACHMENT 4

Meeting with NRC Office of Research

Unnecessary Regulatory Burden

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ComEd
A Unicom Company

Radiation Protection

Unnecessary Regulatory Burden	Proposed Reduction in Regulatory Burden	Basis for Proposed Reduction	Estimated Cost Savings
10 CFR 19.13(b) – advise workers annually of their dose	Revise requirement to only advise workers of their dose upon request or if workers received >100 mrem/yr (general public dose limit)	Information is not useful to workers – workers have means to routinely access their own dose information onsite, always available upon request if worker is no longer onsite.	Administrative cost for letter generation, reviews, mailing estimated at \$6K per year.
10 CFR 20.1904 – each container of licensed material must be labeled; the label must contain specified information	Revise the requirement so that individual containers inside a radiologically posted area (RPA) do not require labeling unless the container's dose rate/contamination level is greater than ambient for the RPA.	Inside a RPA, all material is presumed to be potentially radioactive; no value added to worker maintaining dose ALARA unless level of radioactivity of container is above ambient.	\$50K per year per site; \$250K total (technician and supervisory person-hours)
10 CFR 20.2104 – determination of prior occupational dose requires an attempt to obtain records of cumulative occupational dose	Revise requirement so that an attempt to obtain records of cumulative occupational dose is not required except for a planned special exposure	Cumulative occupational dose information is not useful since all dose limits are annual.	\$100K per year per site; \$500K total
Occupational Radiation Exposure Report (Technical Specifications) - submit an annual report of personnel receiving > 100 mrem in a format consistent with Regulatory Guide 1.16	Eliminate report requirement	Data for specific areas could be provided on an as-needed basis. Dose data is already reported annually to NRC per 10 CFR 20.2206. The information developed for this report is not used by us.	\$30K annual savings from eliminating administrative cost to input data, generate reports, resolve discrepancies

Fitness for Duty

Unnecessary Regulatory Burden	Proposed Reduction in Regulatory Burden	Basis for Proposed Reduction	Estimated Cost Savings
10 CFR 26.3 – definition of suitable inquiry requires best-effort verification of employment history for past 5 years	Reduce best-effort verification of employment history to 3 years	Current definition permits a check to 3 years if unable to obtain any further information	Background investigation cost reduced by approximately 40%, resulting in \$60K annual savings
10 CFR 26, Appendix A, Section 1.2 – definition of permanent record book requires a permanent record book	Eliminate the permanent record book	All the information recorded in it is redundant to the information recorded on the chain of custody forms and entered into the FFD Information System	Administrative cost savings (i.e., data entry, maintenance of books, auditing books) of \$50K/year
10 CFR 26, Appendix A, Section 2.1(a) – requirement to test for drugs on a for-cause alcohol test	Eliminate requirement to perform urinalysis test for drugs as a result of an “odor-of-alcohol” occurrence	Cause for test was alcohol, not drugs; experience indicates no positive results from urinalysis for drugs	Cost of individual’s time pending outcome of urinalysis plus cost of urinalysis – \$9K/year
10 CFR 26, Appendix A, Section 2.7(e)(1) – initial and confirmatory tests cut-off level of 300 ng/ml for opiate metabolites	Increase opiate metabolite cut-off level to 2000 ng/ml for initial and confirmatory tests	DOT regulation changed to increased cut-off level of 2000ng/ml; experience indicates positive initial test results at 300ng/ml do not result in access being denied	Cost of individual’s time pending outcome of laboratory results plus cost of laboratory analysis – \$165K/year
10 CFR 26 Appendix A Section 2.8(c)(3) - a minimum of 10 percent of all test samples shall be quality control specimens	Reduce percentage of quality control specimens to 0	Laboratories used are inspected by the NRC and certified by DHHS, without performance issues, additional control checks provide no benefit	\$10.4K annual savings from reduction in administration and laboratory costs

Physical Protection

Unnecessary Regulatory Burden	Proposed Reduction in Regulatory Burden	Basis for Proposed Reduction	Estimated Cost Savings
10 CFR 73.1(a)(i) and (ii) – requirement to protect against radiological sabotage involving an insider threat	Eliminate the requirement to protect against the insider threat	Compliance with 10 CFR 26 and 10 CFR 73.56 establishes the basis that all persons inside the protected area with unescorted access are trustworthy and reliable; therefore the insider threat is not credible	\$100K savings in personnel reduction per site; \$500K total
10 CFR 73.21(b)(1)(i) through (iv) and (xi) through (xiii) – requirements to classify and maintain/protect information, not critical to the defense of the facility, as Safeguards Information	Eliminate requirements and only classify defensive plans and number of armed responders as Safeguards Information	Information currently listed in identified sections is not relevant to today's defensive strategies and knowledge of this information would not allow unauthorized or undetected access to a facility or compromise response capability	\$114K Safeguards Information handling/storage costs across 5 sites
10 CFR 73.55(c)(5) – lighting requirement of 0.2 ft.-candles in all exterior areas within protected area (PA) beside the isolation zone	Eliminate 0.2 ft.-candle lighting requirement from all other areas within the PA beside the isolation zone	0.2 ft.-candle lighting within the PA does not add any value to assessing the threat which occurs at the isolation zone and is the point at which security personnel initiate actions to neutralize the threat	\$18K savings in lighting maintenance costs across 5 sites

Physical Protection

Unnecessary Regulatory Burden	Proposed Reduction in Regulatory Burden	Basis for Proposed Reduction	Estimated Cost Savings
10 CFR 73.55(d)(4) – requirement that vehicles in the PA be escorted by a member of the security organization	Eliminate the requirement for vehicles entering the PA to be escorted by a member of the security organization	Vehicles would be driven/escorted by individuals badged and granted unescorted access, whose trustworthiness and reliability has been established in accordance with 10 CFR 26 and 10 CFR 73.56.	\$100K savings in security force reduction per site; \$500K total
10 CFR 73.57 - fingerprints for persons to be granted unescorted access must be submitted to the FBI through the NRC with the results returned through the NRC	Eliminate NRC as the intermediary in the criminal history check	The submittal and return through the NRC adds no value and delays obtaining the results for 2 to 6 months versus 24 to 48 hours if we were allowed to submit electronically directly to the FBI	
10 CFR 73.56 - develop information, in part, concerning an individual's credit history, education, and military service prior to granting unescorted access	Eliminate requirement to perform credit, education, and military service checks	These checks have resulted in no denial of unescorted access and provide no value	\$82.5K annual savings by eliminating unnecessary checks
10 CFR 73.55 - requires certain areas and equipment to be designated as vital	Eliminate vital area and equipment designation	Focus of security is now to protect target sets needed to achieve and maintain safe shutdown, the vital designation is no longer meaningful	\$50K annual savings by eliminating costs for maintenance, repair, and compensatory measures

Emergency Preparedness

Unnecessary Regulatory Burden	Proposed Reduction in Regulatory Burden	Basis for Proposed Reduction	Estimated Cost Savings
10 CFR 50.47(c)(2) – plume exposure pathway emergency planning zone (EPZ) shall consist of an area of about 10 miles in radius	Reduce EPZ to five mile radius	Revised source terms	Siren maintenance costs reduced \$200K/yr Public information brochure distribution cost reduced \$47K/yr
NUREG-0654, Appendix 4 – as local conditions change, the evacuation time estimate should be updated	Eliminate requirement to update evacuation time estimates (ETE)	Information is not used for emergency preparedness	\$25K savings from eliminating administrative cost to update ETE

Nuclear Fuels

Unnecessary Regulatory Burden	Proposed Reduction in Regulatory Burden	Basis for Proposed Reduction	Estimated Cost Savings
10 CFR 50.36(c)(1)(i)(A) has been interpreted to require including the value of the minimum critical power ratio (MCPR) in the safety limits section of Technical Specifications	Relocate the value of the MCPR safety limit to a licensee controlled document (e.g., core operating limits report) so that it can be revised under the 10 CFR 50.59 process	The NRC has approved vendor topical reports that provide the methodology we use for determining cycle-specific MCPR safety limits	One technical specifications change request per year - \$75K
10 CFR 50.36(c)(5) has been interpreted to require listing in the administrative controls section of Technical Specifications the methodologies (i.e., topical report number, title, date, revision) used to determine the limits in the core operating limits report (COLR)	Relocate this information to the COLR so that it can be revised under the 10 CFR 50.59 process	All the methodologies listed have been approved by the NRC.	One technical specifications change request per year - \$75K
10 CFR 50.46(a)(3)(ii) – requirement to submit a 30 day report any time the absolute value of peak cladding temperature (PCT) changes by >50°F and an annual report for any change	Eliminate these reporting requirements	This is the only core parameter whose calculated value is required to be reported to the NRC. This parameter only needs to be tracked internally by the licensee and available for NRC inspection upon request.	\$20K per year for annual report and one 30 day report

Nuclear Fuels

<p>10 CFR 50, Appendix K, Section I.A.4 – requirement that decay heat rate be 1.2 times the value calculated using the 1971 ANS Standard</p>	<p>Use more realistic approach for calculating heat generation rates from radioactive decay of fission products</p>	<p>The current requirement applies an unnecessary and unrealistic conservatism</p>	<p>Result would be lower calculated PCT that will allow relaxation of ESF equipment performance assumptions (e.g., diesel generator start time, ECCS pump flow, valve stroke time). Cost savings potential in \$M.</p>
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Reporting Requirements

Unnecessary Regulatory Burden	Proposed Reduction in Regulatory Burden	Basis for Proposed Reduction	Estimated Cost Savings
10 CFR 26.71(d) - submittal of fitness-for-duty (FFD) program performance data every six months	Eliminate requirement to submit the data	FFD program performance data will still be collected, compiled, and available for inspection	\$8K annual savings from eliminating administrative cost to submit data
10 CFR 50.4(b)(6) - submit signed original and 10 copies of updated final safety analysis report (UFSAR) replacement pages to the Document Control Desk (Note: this also applies to other documents periodically updated that are referenced in UFSAR, e.g., fire protection report, etc.)	Eliminate requirement to include 10 copies of updated document replacement pages	Now that NRC is using ADAMS and reducing dependency on paper copies of documents, it no longer makes sense to send the Document Control Desk 10 copies	\$4 K annual savings by eliminating administrative cost to prepare 10 additional copies of each updated document
10 CFR 50.36a(a)(2) - submit annual radioactive effluent reports	Eliminate requirement to submit an annual report	10 CFR 50 Appendix I Section IV.A requires the NRC be notified if actual release during any calendar quarter would exceed one-half the design objective annual exposure; otherwise routine information available for inspection	\$8K savings annually by eliminating cost to submit report
10 CFR 50.54(p)(2) and 10 CFR 72.44(e) - submit within 2 months changes made to physical security plans without prior NRC approval	Eliminate requirement to submit changes made without prior NRC approval	Submittal is of informational nature only, physical security plans are available for inspection as are any related evaluations of changes made without NRC prior approval	\$6K savings by eliminating cost to submit changes

Reporting Requirements

Unnecessary Regulatory Burden	Proposed Reduction in Regulatory Burden	Basis for Proposed Reduction	Estimated Cost Savings
<p>10 CFR 50.54(q), 10 CFR 50 Appendix E Section V, and 10 CFR 72.44(f) - submit within 30 days any changes made to the emergency plan or implementing procedures without prior NRC approval (Note: 10 CFR 72.44(f) is similar requirement but allows six months)</p>	<p>Eliminate requirement to submit changes made without prior NRC approval</p>	<p>Submittal is of informational nature only, emergency plan and implementing procedures are available for inspection as are any related evaluations of changes made without NRC prior approval</p>	<p>\$10K savings by eliminating cost to submit changes</p>
<p>10 CFR 50.54(w)(3) - annual property insurance coverage report specifying level of insurance maintained and its source</p>	<p>Eliminate requirement to submit report</p>	<p>10 CFR 50.54(w)(1) specifies amount of insurance required and acceptable sources, a licensee is required to comply with the regulations, submittal of the information annually serves no purpose and is not required in the case of other regulations to demonstrate compliance</p>	<p>\$4K annual savings from eliminating cost to submit report</p>
<p>10 CFR 50.54(bb) - submit to NRC for review and preliminary approval the irradiated fuel management and funding plan and notify the NRC of any future significant changes</p>	<p>Eliminate requirement to submit plan and future notifications</p>	<p>In part, the information required is redundant to that required by 10 CFR 50.82 in the post-shutdown decommissioning activities report and the site specific decommissioning cost estimate. Also, if a licensee chooses dry cask storage, the NRC is notified in accordance with 10 CFR 72.</p>	<p>\$10K savings from eliminating cost to submit plan and future notifications</p>

Reporting Requirements

Unnecessary Regulatory Burden	Proposed Reduction in Regulatory Burden	Basis for Proposed Reduction	Estimated Cost Savings
10 CFR 50.59(b)(2) and 10 CFR 72.48(b)(2) - periodically submit a summary of 10 CFR 50.59 and 10 CFR 72.48 evaluations	Eliminate requirement to submit summary reports	The completed evaluations are available for inspection, the submittal is of only informational nature	\$125K savings annually by eliminating cost to submit report
10 CFR 50.71(b) - submit the annual financial report, including the certified financial statements, upon issuance of the report	Eliminate requirement to submit report	Submittal is of informational nature only, the annual report is available for inspection	\$2K annual savings from eliminating cost to submit report
10 CFR 72.44(d)(3) - submit an annual report of radioactive effluents	Eliminate requirement to submit report for dry cask storage types which do not have effluents	No value added to submit a report of effluents when by design no effluents will occur and the NRC acknowledges this in the cask safety evaluation	\$1K annual savings from eliminating cost to submit report
10 CFR 140.21 - submit annually evidence of guarantee of payment of deferred premiums	Eliminate submittal requirement	Submittal is of informational nature only and the reporting requirement is redundant to base regulation 10 CFR 140.11 which a licensee must be in compliance	\$4K annual savings from eliminating cost to submit report