

August 23, 2000

MEMORANDUM TO: Jack R. Strosnider, Director  
Division of Engineering

FROM: Stephanie M. Coffin, Acting Technical Assistant **IRAI**  
Division of Engineering

SUBJECT: MEETING SUMMARY - REDUCING UNNECESSARY REGULATORY  
BURDEN - INFORMATION COLLECTION INITIATIVE

On July 27, 2000, Division of Engineering staff hosted an internal stakeholders meeting to discuss a new NRR initiative. The purpose of this initiative is to collect certain, specific information from our external stakeholders to assist us in identifying those work items that leverage our strategic pillars, particularly maintaining safety, reducing unnecessary regulatory burden and improving efficiency and effectiveness. These data will be used to help assign priority to NRC work and to relate NRC products (outputs) to strategic performance goals. Many offices besides NRR sent representatives to this meeting; the attendance list is shown in Attachment 1.

The meeting was opened by characterizing the initiative, its purpose, the significant milestones, and the overall approach. Attachment 2 provides an overview of the initiative in its current form. Discussion on all aspects of the initiative were invited during the meeting and are summarized below.

#### Summary

The objective of this initiative is to develop and implement a process for collecting information from our stakeholders as to how their work item leverages NRR outcomes. This information would be used to assign priorities, allocate resources, and plan our work such that we emphasize those work items that leverage NRR desired outcomes (e.g., reducing unnecessary regulatory burden). In addition to using this information for prioritizing work, it would also be used to demonstrate to others how our outputs support our desired outcomes. Currently, we have more statistics on outputs (e.g., number of licensing actions completed) as opposed to outcomes (e.g., reduction in man-rem dose).

It is envisioned that for each work item that comes into NRR, the initiator (e.g., vendor or licensee) of that work item voluntarily provide an indicator as to how safety is maintained and its potential benefit (e.g., reduction in cost, risk, or radiation exposure). For example, a licensee requests that we grant them relief from an inservice inspection requirement. The requirement is to perform a 100% inspection sample and the licensee proposes to do a 50% inspection

sample and provides the appropriate basis for this change. Consistent with this initiative, they describe how they maintain safety and reduce outage time by 24 hours and save 1 man-rem with the smaller inspection sample.

By compiling this type of information over the fiscal year, instead of simply stating that the staff completed 1500 licensing actions (outputs), the staff can also develop statistics such as direct cost savings to licensees, man-rem savings, and reduced risk (outcomes). The staff may also identify that some licensing actions were either unquantifiable, neutral or even negatively leveraged the strategic goals. As an outcome, this initiative may help to identify unnecessary regulatory burden and/or further ways of improving efficiency and effectiveness.

There was discussion regarding identification of which NRR work items that information should be collected. It was suggested by some that, initially, the staff should focus on a few specific work items. NRR work items include license amendments, license applications, topical reports, 2.206 petitions, license renewal applications, industry initiatives, relief/exemption requests, new ASME code editions or code cases, license transfers, decommissioning plans, and rulemakings. This includes submittals from utilities, vendors, owners groups, petitioners, public, UCS, NEI, etc.

Potential information to collect may include reduction in core damage frequency, dollars saved, man-rem saved (man-rem saved was considered particularly valuable as it can be converted into dollars and it is the underlying basis for our safety goals), changes in defense-in-depth, safety margin, or risk, radwaste avoided, environmental effect (nuclear versus fossil), reduction in human error, and reduction in paperwork. Some ideas directly related to license renewal include how much extra revenue can now be generated with minimal capital expense versus dollars spent on decommissioning, alternate power, and averted environmental pollution.

Bob Perch from the Work Planning Center (WPC) provided some insight into how the WPC has incorporated a work prioritization plan. They use 4-5 metrics to provide an overall "ranking" of the work item. The WPC plans to incorporate this prioritization scheme directly into their planning and scheduling software. Because this initiative could possibly result in additional or different approaches, it needs to be closely coordinated with the WPC as the system evolves to understand how this initiative can complement the WPC efforts.

Several opportunities were identified for stakeholder involvement through other forums such as the national licensing workshop on November 1<sup>st</sup> and 2<sup>nd</sup>, the communications task force interactions with industry, and the licensing action task force interactions with industry on September 20<sup>th</sup>.

Challenges that may arise include:

- The program will be voluntary in nature. There may be unwillingness by licensees or vendors to provide information because it is difficult to quantify and/or because the information may unintentionally impact other areas such as financial ratings or public perception.
- It is difficult to develop an indicator for public confidence. The results of the ongoing communications team efforts may provide some insight for this indicator.

Additional comments were solicited through a handout (attachment 3) subsequent to the meeting.

Next Steps

A meeting with external stakeholders is tentatively planned for September 20, 2000 to discuss this initiative and solicit feedback. A meeting notice will be issued shortly. Although this is currently an NRR initiative, it may apply to other offices. Broad agency participation was encouraged and a point of contact within each interested NRC office was requested.

Subsequent to an external stakeholder meeting, a proposed approach will be issued in the Federal Register for public comment. The goal is to have an information collection process in place by October, 2001.

**List of Attendees**

<b>Name</b>	<b>Office</b>
Stephanie Coffin	NRR/DE
Goutam Bagchi	NRR/DE
Cornelius Holden	NRR/DE/EEIB
Noel Dudley	ACRS
George Deegan	NMSS/IMNS
Bruce Boger	NRR/DIPM
Dick Wessman	NRR/DE
Jack Strosnider	NRR/DE
Dale Powers	Region IV (via telecon)
John Zwolinski	NRR/DLPM
Charles Ader	NRR/DRIP
Gene Imbro	NRR/DE/EMEB
Tim Collins	NRR/DSSA
Patricia Eng	NMSS/SFPO
Alan Kuritzky	RES/DRAA/PRAB
Bill Raughley	RES/DSARE/REAHFB
Ted Sherr	NMSS/FCSS/SSSB
Kerri Kavanagh	NRR/DSSA
John Davidson	NMSS/FCSS/SSSTS
Pat Madden	NRR/DLPM
Bob Perch	NRR/PMAS
Jim Turdici	OCIO

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**Feedback for Internal Stakeholders Meeting - July 27, 2000**

Question 1 - Which industry submittals (e.g., license amendments, topical reports, rulemakings) should contain the voluntary measures of potential benefit such as risk or cost reduction?

Question 2 - What are some potential measures (e.g., reduction in CDF, \$ saved, man-rem saved)?

Question 3 - From whom (e.g., licensees, vendors, petitioners) should the NRC collect the voluntary measures of potential benefit?

Please return to Stephanie Coffin (O-9H10, 415-2778) by 8/3/2000