

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

October 20, 2000

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

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

On September 20, 2000, NRC staff hosted an external 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 the staff 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 NRR work and to relate NRR products (outputs) to strategic performance goals. Several organizations 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 of Information Collection Initiative

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 the staff emphasizes 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, the staff has 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, owners group, or licensee) of that work item voluntarily provides an indicator as to how safety is maintained and its potential benefit (e.g., reduction in cost, risk, or radiation exposure). For example, consider a licensee request for 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.

### Summary of Comments

In general, participants were supportive of the information collective initiative concept of tying outputs to outcomes, but they were less sure about the information collection initiative being used to prioritize work. They voiced concerns that this voluntary information request could itself become a burden if the staff requested too much information or if the staff expected rigorous calculations to support the information provided. Participants suggested this could be avoided by keeping the information request simple and allowing for qualitative measures. They also voiced concerns that it would be difficult to protect against exaggerated information being provided to obtain a higher work priority. They were also concerned that if no information was provided that the priority of the request would be lowered. Meeting participants suggested that by openly sharing the work prioritization process and the final result of that work prioritization process with external stakeholders, some of these concerns could be alleviated.

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

### Next Steps

A proposed approach will be issued in the Federal Register for public comment in late October or early November. This will be followed by a second public meeting in February to reach a consensus on the initiative. The goal is to have an information collection process in place by October 2001.

Attachments: As stated

cc: Meeting Attendees  
SCollins  
RZimmerman  
AThadani  
WKane  
BSheron  
JJohnson  
JSilber  
GImbro  
WBateman  
JCalvo  
RPerch

### List of Attendees

Name	Organization
Jack Strosnider	NRC/NRR/DE
Leslie Collins	Westinghouse
Noel Dudley	NRC/ACRS
Roger Huston	Licensing Support Services
Deann Raleigh	Serch, Bechtel Power
Charles Willbanks	NUS Information Services
Stephanie Coffin	NRC/NRR/DE
Renee Pedersen	NRC/NRR/OE
George Lanik	NRC/RES
Brian Sheron	NRC/NRR
James Fisicaro	Duke - Energy
Alex Marion	NEI
Dan Stenger	Hopkins & Sutter
Jose Ibarra	NRC/RES/DSARE
Bill Raughley	NRC/RES
Frank Cardile	NRC/NMSS/IMNS
Mike Schoppman	NEI/LATF
Herb Fontecilla	Dominion
Timothy Wolf	Morgan Lewis & Bolkius

## **Feedback for External Stakeholders Meeting - September 20, 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, FAX 301-415-2444 or email [smc1@nrc.gov](mailto:smc1@nrc.gov)

ATTACHMENT 3

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.

### Summary of Comments

In general, participants were supportive of the information collective initiative concept of tying outputs to outcomes, but they were less sure about the information collection initiative being used to prioritize work. They voiced concerns that this voluntary information request could itself become a burden if the staff requested too much information or if the staff expected rigorous calculations to support the information provided. Participants suggested this could be avoided by keeping the information request simple and allowing for qualitative measures. They also voiced concerns that it would be difficult to protect against exaggerated information being provided to obtain a higher work priority. They were also concerned that if no information was provided that the priority of the request would be lowered. Meeting participants suggested that by openly sharing the work prioritization process and the final result of that work prioritization process with external stakeholders, some of these concerns could be alleviated.

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

### Next Steps

A proposed approach will be issued in the Federal Register for public comment in late October or early November. This will be followed by a second public meeting in February to reach a consensus on the initiative. The goal is to have an information collection process in place by October 2001.

Attachments: As stated

cc: Meeting Attendees  
SCollins  
RZimmerman  
AThadani  
WKane  
BSheron  
JJohnson  
JSilber  
GImbro  
WBateman  
JCalvo  
RPerch

Distribution/Concurrence See next page

Distribution

C. Ader	J. Davidson	J. Caldwell	B. Perch
G. Bagchi	G. Deegan	T. Gwynn	B. Sheron
W. Bateman	P. Eng	K. Landis	J. Silber
B. Boger	P. Holahan	B. Mallett	R. Wessman
J. Calvo	S. Shankman	D. Powers	R. Zimmerman
N. Dudley	T. Sherr	J. Wiggins	J. Zwolinski
T. Collins	M. Virgilio	W. Lanning	DE RF
F. Combs	M. Federline	V. Dricks	Public Document
C. Holden	A. Kuritzky	R. Architzel	D. Corley
G. Holahan	W. Raughley	J. Tappert	J. Craig
G. Imbro	J. Rosenthal	G. Suh	
J. Johnson	J. Turdici	L. Allenbach	
K. Kavanagh	D. Grimsley	P. Madden	
P. Madden	W. Borchardt	T. McMurtray	
D. Matthews	J. Moore		

**ACCESSION NUMBER: ML003761723**

Office	DE
Name	SMCoffin
Date	10/20/00

ORIGINAL RECORD COPY