

## **NRC INITIATIVES TO REDUCE BURDEN**

**Agency:** U.S. Nuclear Regulatory Commission

**Title of the Initiative:**

MEET PERFORMANCE GOAL OBJECTIVE OF NRC'S STRATEGIC PLAN BY REDUCING THE PAPERWORK AND RECORDKEEPING BURDEN IMPOSED ON POWER REACTOR LICENSEES

**Abstract:**

The NRC has developed an initiative to review various reporting requirements for power reactor licensees under 10 CFR Parts 50 and 140 to determine which could be modified or eliminated to reduce unnecessary regulatory burden. The initiative is described in NRC document SECY-02-0081, "Staff Activities Related to the NRC Goal of Reducing Unnecessary Regulatory Burden on Power Reactor Licensees." The NRC began developing the initiative in FY 2002 and will pursue the associated rulemakings and related activities during FY 2003 and FY 2004. Within NRC, the Office of Nuclear Reactor Regulation (NRR), Division of Regulatory Improvement Programs, would have primary responsibility for developing and implementing these burden reduction rulemakings.

**How Performance Improved:**

The initiative would eliminate redundant reports, informational reports where the information is available from inspection, reports of questionable value and, in the case of decommissioning funding, would require reporting only when the licensee's funding method has significantly changed. These initiatives are expected to reduce the burden on licensees associated with periodic reporting requirements by eliminating certain reporting requirements, reducing the frequency of reporting, or making the required report an exception report.

**Measurable Objective:**

A reduction in licensee burden hours for periodic reporting, based on revisions to the regulations, and also burden reductions for certain administrative reporting and information collection requirements contained in technical specifications, but not specifically stated in the regulations.

**Current Status/Progress Made:**

By SRM dated June 25, 2002, the NRC Commissioners authorized the NRC staff to proceed with the program for burden reduction described in SECY-02-0081. In FY 2003, NRR intends to develop a plan to determine which rule changes would reduce the licensee burden without compromising safety. The first rule changes may not occur until FY 2004.

**Agency:** U.S. Nuclear Regulatory Commission

**Title of the Initiative:**

RISK-INFORMING REGULATIONS TO REDUCE UNNECESSARY REGULATORY BURDEN ON REACTOR LICENSEES

**Abstract:**

NRC is implementing risk-informed regulation as expressed in its 1995 policy statement on the use of probabilistic risk assessment (PRA) methods in nuclear regulatory activities under 10 CFR Part 50. The NRC expects that implementing this policy will improve the regulatory process in three ways: (1) by incorporating PRA insights in regulatory decisions, (2) by conserving agency resources, and (3) by reducing unnecessary burden on reactor licensees. NRC's Office of Nuclear Reactor Regulation has primary responsibility for developing and implementing this initiative, with assistance in the area of probabilistic risk assessment from NRC's Office of Nuclear Regulatory Research.

**How Performance Improved:**

In 1998, the agency formally defined risk-informed regulation as an approach to regulatory decisionmaking that uses risk insights as well as traditional considerations to focus regulatory and licensee attention on design and operational issues commensurate with their importance to health and safety. A risk-informed approach enhances the traditional approach by (a) explicitly considering a broader range of safety challenges; (b) prioritizing these challenges on the basis of risk significance, operating experience, and/or engineering judgment; (c) considering a broader range of countermeasures against these challenges; (d) explicitly identifying and quantifying uncertainties in analyses; and (e) testing the sensitivity of the results to key assumptions. A risk-informed regulatory approach may also identify insufficient conservatism and provide a basis for additional requirements or regulatory action. The approach may also be used to concentrate information collection requirements in the areas of risk significance, while decreasing the information collection requirements in risk-insignificant areas.

**Measurable Objective:**

The staff has developed the following objectives for identifying regulatory activities that could benefit from risk information. The regulatory changes should (1) help resolve questions with respect to maintaining or improving an activity's safety, (2) improve the efficiency or the effectiveness of the NRC regulatory process, (3) reduce unnecessary regulatory burden on applicants or licensees, and/or (4) help to effectively communicate a regulatory decision.

**Current Status/Progress Made:**

Over the past few years, the NRC has made significant progress toward risk-informing NRC's regulatory activities. The NRC has completed risk-informed regulatory activities, including the maintenance rule, inservice inspection, inservice testing, event notification, and several risk-informed technical specification initiatives, which have significantly reduced licensee burden. Currently, the NRC staff is working on risk-informed changes to Special Treatment Requirements, Hydrogen Control Requirements, Emergency Core Cooling System (ECCS) Acceptance Criteria, Fire Protection, and numerous other technical specification initiatives. The schedules listed below have not been fully developed because of resource constraints on new actions. NRC is also developing other processes to aid in the implementation of a risk-informed regulatory framework.

<b>Rulemaking</b>	<b>Advanced Notice of Proposed Rulemaking</b>	<b>Proposed Rule</b>	<b>Final Rule</b>
Special Treatment Requirements	03/03/00	02/01/03	TBD
Combustible Gas Control in Containment (Parts 50 & 52)		08/02/02	05/01/03
ECCS Acceptance Criteria		TBD	TBD
Fire Protection Requirements		11/01/02	02/08/04

**Agency:** U.S. Nuclear Regulatory Commission

**Title of the Initiative:**

CONSOLIDATED NMSS DECOMMISSIONING GUIDANCE, NUREG-1757, VOLUMES 1-3

**Abstract:**

As part of its redesign of the materials license program, the U.S. Nuclear Regulatory Commission (NRC), Office of Nuclear Material Safety and Safeguards (NMSS), is consolidating and updating all existing NMSS decommissioning guidance documents, decommissioning technical assistance requests, decommissioning licensing conditions, and all decommissioning generic communications issued over the past several years. The goal is to produce consolidated NMSS decommissioning guidance that allows the NRC staff to evaluate information submitted by licensees in a timely, efficient, and consistent manner that protects public health and safety. The end result will be a streamlined, three-volume NUREG on the following topics:

1. Decommissioning Process for Materials Licensees
2. Characterization, Survey, and Determination of Radiological Criteria
3. Financial Assurance, Recordkeeping, and Timeliness

These guidance documents will affect materials licensees under 10 CFR Parts 30 through 39, 40, 70, 72, and 74.

**How Performance Improved:**

When complete, this three-volume guidance will replace NUREG-1727 (NMSS Decommissioning Standard Review Plan) and NUREG/BR-0241 (NMSS Handbook for Decommissioning Fuel Cycle and Materials Licensees). This guidance takes a risk-informed, performance-based approach to the information needed to support an application for decommissioning a materials license. The approaches to license termination described in this guidance will help to identify the information (subject matter and level of detail) needed to terminate a license by considering the specific circumstances of the radioactive materials user licensed by NRC. Licensees should use this guidance in preparing license amendment requests, and NRC staff in reviewing these amendment requests. Because both NRC staff and licensees will be able to identify both the types of information and the level of detail required to evaluate decommissioning plans before the plans are developed, the need for clarification of information or requests for additional information from licensees should be reduced.

**Measurable Objective:**

Increased efficiency by staff and licensees, resulting in burden reduction for both staff and licensees.

**Current Status/Progress Made:**

Volume 1 - Final published in September 2002.

Volume 2 - Draft published for public comment in September 2002. Final scheduled for publication in June 2003.

Volume 3 - Draft scheduled for publication for public comment in January 2003. Final scheduled for publication in September 2003.

No expected impediments to on-time completion of project.

**Agency:** U.S. Nuclear Regulatory Commission

**Title of the Initiative:**  
CONSOLIDATION OF LICENSING PROCESS REQUIREMENTS

**Abstract:**

NRC's Office of Nuclear Material Safety and Safeguards has developed a new materials licensing process which will significantly reduce the regulatory burden on materials licensees under 10 CFR Parts 20, 30 through 39, 40, 70, 72, and 74. The goals of this initiative are to:

- maintain or raise the level of public safety, while reducing government resources necessary to issue licenses
- issue licenses more quickly
- implement user-oriented information technology

NRC has replaced the current guidance with a series of comprehensive and consolidated electronically searchable guidance documents. The staff used collaborative writing and the associated hardware/software to develop the revised guidance documents. The guidance consists of a series of "volumes" specific to each use of licensed byproduct material. Each volume contains all the information needed to prepare license applications, amendments, and renewal applications; satisfy technical, recordkeeping and reporting requirements; and prepare for NRC inspections.

**How Performance Improved:**

The NRC technical staff uses the consolidated guidance to review and complete licensing actions more quickly and consistently. Applicants and licensees would use the guidance to prepare their license applications, amendments, and renewal applications. The revised guidance will take a risk-informed, performance-based approach. Licensees' use of the guidance reduces burden in three ways: (1) by clearly defining submission requirements, so that there are fewer requests for additional information, (2) by focusing on health and safety programmatic concerns rather than detailed safety-insignificant requirements, and (3) by allowing the licensees to submit statements that they have met certain program requirements and to maintain the information onsite, rather than submit it for approval.

**Measurable Objective:**

Increased efficiency by staff and licensees, resulting in burden reduction for both staff and licensees.

**Current Status/Progress Made:**

During FY 2001 the staff issued seven final license guides. The final guides provide program-specific guidance on special nuclear material of less than critical mass, service providers, reciprocity, manufacturing and distribution, master material licensees, general licenses, bankruptcy, and administrative licensing procedures. During 2002, the staff issued the final guide which provides program-specific information on medical use licenses. NRC issued one revised guidance document in FY 2001 on portable gauge licenses and plans to issue three revised guidance documents in FY 2003.

NUREG 1556 Volume 1, Revision 1 - final published November 2001  
NUREG 1556 Volume 3, Revision 1 - final anticipated June 2003  
NUREG 1556 Volume 2, Revision 1 - final anticipated September 2003  
NUREG 1556 Volume 8, Revision 1 - final anticipated September 2003

No expected impediments to on-time completion of project.