

## Resource Estimate to Address ACRS Issues and Complete Rule

Issue No. or Activity	Issue Summary/Description	FTE
1.a	What should be the basis for determining the adequacy of defense-in-depth and safety margins in reactor designs?	0.1
1.b	Non safety equipment needed for beyond TBS needs special treatment and controls.	0.3
1.c	Require staff review of codes used for beyond TBS breaks	0.1
2.	More defense-in-depth would allow smaller TBS - (Included in Issue 1)	-
3.	What should be the change process and acceptance criteria for determining the acceptability of changes in risk?	0.9
4.	Wait for revised cladding acceptance criteria before issuing final rule (assumes cladding acceptance criteria rule budgeted separately)	0.1
5.	Licensee must demonstrate applicability of NUREG 1829 to each plant (See Note 3)	0.5
6.	Don't issue rule until NUREG 1829 is finalized.	0.3
7.a	ACRS should complete its review of seismic report before the final rule is issued.	0.2
7.b	Licensees must demonstrate applicability of seismic report to each plant.	0.4
7.c	Licensees must demonstrate robustness of flawed piping	0.4
	Rulemaking project management activities	2.1
	Regulatory guide coordination	0.5
	<b>Total :</b>	<b>5.9</b>

- Notes:**
1. Estimates assume that no complex regulatory guides will be needed for seismic analyses, special treatment requirements or plant specific applicability of NUREG-1829.
  2. The FY 2007 budget includes 0.7 FTE to address aspects of issues 6 and 7. No additional resources are currently budgeted for this rulemaking activity.
  3. Contractor support costing \$250K is also needed to develop regulatory guidance for this issue.