

# *CRGR Stakeholder Meeting to Discuss NRC Backfit Controls*

U.S. Nuclear Regulatory Commission  
Committee to Review Generic Requirements

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Doubletree Hotel, Plaza III  
1750 Rockville Pike, Rockville, MD

presented by:

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Fuel Cycle Facilities Forum

# Overview

- Introduction to *The Fuel Cycle Facilities Forum (FCFF)*
- Review of key backfit provisions
- Fuel cycle industry backfit perspective
- Awareness
- Possible new approaches for CRGR

# *Introduction to the FCFF*

- Voluntary organization
- Established 1987
- Represents Source Material and Special Nuclear Material (SNM) sites - i.e. licensees requiring special NRC consideration
- Primary focus on *decommissioning*
- Provide feedback/input to NRC staff

# *Key Backfit Provisions*

- Backfitting definition
- Exemptions from backfit analysis:
  - Defining or redefining level of protection
  - Level of protection regarded as adequate
- Installation and continuing costs
- Two or more ways to reach adequate protection
- General description of activity required by the licensee to complete backfit

# *Fuel Cycle Facility Backfit Perspective*

- Decommissioning:
  - Approved Decommissioning Plans (DP)
  - Partial site cleanup
- Licensing & Operations:
  - NRC staff turnover
  - Backfit implementation generally OK

# *Awareness*

- Fuel Cycle Industry
  - Backfit rule (10 CFR 70.76)
  - CRGR backfit management program
- NRC
  - Generic policies and guidance
  - Site-specific approvals

# *Possible New Approaches for CRGR*

- Membership
- Expand the CRGR charter
  - Other major regulatory actions
  - Licensee implementation
- Industry feedback
  - Generic and site specific



*Questions??*