



Status of Part 70-Related Proposals for the Pending Revision of the NRC Enforcement Policy

Part 70 Working Group on
Enforcement Policy
Fuel Cycle Information Exchange
June 19, 2008



Background

- 10CFR70 revised in 2000
 - Enforcement Policy fuel facility supplement does not reflect revised 10CFR70
- FCSS working to update supplement and upgrade policy
 - OE revising NRC enforcement policy
- Industry interested in updating fuel facility supplement
 - Benefit from ISA risk insights
 - Improve enforcement consistency



Working Group on Enforcement

- FCSS committed to updating enforcement policy to reflect ISA process
 - Initiated in 2005
- Work Group formed after 2007 FCIX to include public participation
- Four public meetings held
- Group has drafted proposed enforcement examples for revised policy



Working Group Membership

- NRC
 - Debbie Jackson - Chair
 - Dennis Morey – NRC FCSS
 - Chris Tripp – NRC FCSS
 - Manuel Crespo – NRC Region II
 - Amy Luebbering – NRC FMB
- Industry
 - Steve Schilthelm – Babcock and Wilcox
 - Nancy Parr - Westinghouse
 - Mike Boren, United States Enrichment Corporation
 - John Nagy, Nuclear Fuel Services



Revised Fuel Cycle Enforcement Supplement

- Examples to be split between Policy and Enforcement Manual
- Group has drafted Policy-level examples
- Next step is Manual-level examples
- Rationale for new examples
 - Base severity level on risk
 - Use licensee ISA process
 - Eliminate inconsistencies



Risk Determination Process

- Risk determination process necessary to use ISA process
- FCSS is drafting Inspection Manual Chapter with risk determination process
- Process basis:
 - Licensee identified accident sequence
 - Licensee IROFS and other controls
 - Approved ISA process



Next Steps

- Draft NRC enforcement policy FRN for public comment
- Continue Working Group activities
 - Enforcement Manual violation severity level examples
 - Inspection Manual Chapter risk determination process



Working Group Process

- Industry Perspective
 - Extremely positive process
 - Good stakeholder representation
- NRC Perspective
 - Understanding industry perspective is helpful
 - Good record of the development process
 - Stakeholder issues resolved early