

Coordination with Ongoing Initiatives

Any actions taken under Options 2 and 3 would have to be coordinated with ongoing initiatives, such as Near Term Task Force (NTTF) Recommendation 1 and activities conducted in response to NUREG-2150, "A Proposed Risk Management Regulatory Framework (RMTF)," issued in April 2012. For example, the NTTF recommended that the Regulatory Analysis Guidelines be modified to more effectively implement the defense-in-depth philosophy in balance with the current emphasis on risk-based guidelines. The NTTF concluded that the NRC's current approach to the issue of land contamination from reactor accidents is sound. The NTTF also believed that the Regulatory Analysis Guidelines could be modified by implementing some of the concepts presented in the technology-neutral framework (NUREG-1860) to better integrate safety goals and defense-in-depth (Recommendation 1.3). Current Recommendation 1 activities contemplate potential changes to the regulatory analysis guidance but do not currently consider changes with respect to offsite property damage, given the NTTF conclusion. The RMTF in NUREG-2150 also discussed updating regulatory analysis guidelines to ensure an effective cost-benefit analysis is performed by licensees when considering ways to address design-enhancement events. Recommendation PR-R-2 of NUREG-2150 states that the NRC should establish through rulemaking a design-enhancement category of regulatory treatment for beyond-design-basis accidents. This category would use risk as a safety measure, be performance-based (including the provision for periodic updates), include consideration of costs, and be implemented on a site-specific basis. Although not a formal recommendation, the RMTF stated in NUREG-2150, "At the point where Level 3 PRAs are available, the NRC's Quantitative Health Objectives or other societal measures could be directly considered as part of the event categorization criteria."