

**Cumulative Effects of Regulation Public Meeting: Handout on Case Studies  
May 8, 2013**

**Staff Requirements Memorandum (SRM) Direction:**

“The staff should engage industry to seek volunteer facilities to perform “case studies” to review the accuracy of cost and schedule estimates used in NRC’s regulatory analysis (such as the 10 CFR Part 73 security upgrades required after the attacks of September 11, 2001 and 10 CFR 50.48c, NFPA 805 program). Within 3 months of this SRM, the staff should provide via a Commissioners’ Assistants Note a status update on its efforts to obtain volunteer facilities.”

**Potential Subject Rules:**

Rule	Regulatory Analysis
Commission-suggested (in SRM)	
<b>10 CFR 73, Power Reactor Security Requirements [ 74 FR 13926]</b> RIN 3150-AG63	ML083390372
<b>10 CFR 50.48(c), NFPA 805 [69 FR 33550]</b> RIN 3150-AG48	ML040540542
Additional Possibilities	
<b>10 CFR 26, Subpart I, Managing Fatigue [73 FR 17176]</b> RIN 3150-AF12 RIN 3150-AI94	ML080580135
<b>10 CFR 20.2207(h), National Source Tracking of Sealed Sources [71 FR 65686, 11/8/2006]</b> RIN 3150-AH48	ML062580178

**Possible Approach:**

- Starting with the final rule’s regulatory analysis (RA), compare the cost and schedule estimated in the RA with the actual implementation cost and schedule.
- In tabular format (either excel spreadsheets or other tables), create a direct comparison that conforms to the breakout included in the regulatory analysis.\*
- Where differences between estimated and actual costs and schedules exist, the following information is useful:
  - What other plant activities were performed concurrently, which affected implementation costs and/or schedule
  - What was the net cost following the first year after implementation? Were these recurring costs constant or did these costs change in subsequent years? If so, what were the reasons for the change in cost?
  - Did any unit- or site-specific features add complexity to the implementation that affected the cost and schedule or increased the cost for maintaining the added structures, systems, or components?
  - What other features are included in this cost and schedule data that enhanced recordkeeping, reduce administrative or operation burden, etc.? What were the costs for implementing these features and what was the payback?
  - Does the data provided reflect any cost savings that resulting from implementing the rule requirements? If so, what were the cost savings and how were they calculated?
  - What variability in implementation and operation cost and schedule exist between reactor units located on the same site or for reactor units located on different sites?

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\* If it is not possible to provide a direct comparison to the RA, please consider the following costs:

Industry Implementation (covers initial one-time implementation costs and schedule attributable to the regulation) with the following suggested cost and schedule breakout

- Procedure and administrative costs
- Engineering services
- Structures
- Equipment and materials
- Construction-related costs (including plant inspections to validate implementation)
- Recordkeeping
- Staff training
- Facility shutdown, restart costs
- Replacement power costs
- Etc.

Industry Operation (covers recurring annual costs attributable to the regulation *after* implementation) with the following suggested cost and schedule breakout

- Annual maintenance costs for added structures, equipment, components
- Annual test and/or inspection cost for added structures, equipment, components
- Annual cost for updates for records and/or procedures
- Annual administrative cost, engineering analytical costs to perform newly imposed activities or to assure continued compliance
- Etc.