Basis for Two-Phased Approach

There are three main NUREGs that provide guidance for cost-benefit analysis, NUREG/BR-0058, Revision 4, "Regulatory Analysis Guidelines," dated September 2004 (ADAMS Accession No. ML042820192), NUREG/BR-0184, "Regulatory Analysis Technical Handbook," dated January 1997 (ADAMS Accession No. ML050190193), and NUREG-1409, "Backfitting Guidelines," dated July 1990 (ADAMS Accession No. ML032230247). The two-phased approach to revising cost-benefit guidance aims to resolve two separate, but important issues. The first phase of revising cost-benefit guidance will resolve structural issues, terminology conformity, and other administrative issues with the guidance documents. The second phase will resolve potential policy issues related to cost-benefit guidance and will take a holistic view of the cost-benefit guidance and update determinations for consequences and probabilities, as necessary.

NUREG/BR-0058 provides high-level guidance for regulatory analysis and refers users to NUREG/BR-0184 for more technical information. NUREG/BR-0058 also contains information on backfitting, specifically surrogates for core damage frequency (CDF) and conditional containment failure probability for a substantial safety enhancement determination under 10 CFR 50.109. Because there is guidance information on backfitting in both NUREG/BR-0058 and NUREG-1409, there may be confusion on the NRC's position on issues related to backfitting. As NUREG/BR-0058 has been updated more recently than NUREG-1409, it can create the impression that NUREG-1409 no longer provides the NRC position on backfitting guidance. Therefore, eliminating NUREG-1409 and inserting that information into NUREG/BR-0058 removes potential confusion and ensures that backfitting guidance can be easily located.

NUREG/BR-0184 provides the technical determination of the parts of a regulatory analysis for nuclear production and utilization facilities but provides less detailed guidance for other cost-benefit applications.[1] Because of the breadth of information within NUREG/BR-0184, making revisions to the NUREG are resource-intensive and deter updates to specific technical areas.[2] However, those technical areas within NUREG/BR-0184 that refer to other NUREGs (e.g., dollar per person-rem, replacement energy costs) are able to be more easily updated. Removing NUREG/BR-0184 and inserting the information into technical area specific volumes or appendices of NUREG/BR-0058 will provide a single point of reference, yet allow the staff to update specific areas when necessary. An example of this approach is "Consolidated Guidance about Materials Licenses," NUREG-1556.[3] This new document structure should significantly increase efficiency and ease the burden of updating cost-benefit guidance.

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[1] While the guidance document is written for regulatory analysis involving nuclear facilities, staff also use the document for National Environmental Policy Act (NEPA)-related environmental reviews.

[2] The term "technical area" is used instead of "attribute" as it may be appropriate to include multiple attributes within one NUREG. For example, the consequences for public health (accident) and offsite property attributes are determined through the use of MACCS2; therefore, it may be appropriate to have them within the same NUREG instead of two separate NUREGs.

[3] http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/