

June 12, 2014

MEMORANDUM TO: Tara Inverso, Chief
Rulemaking Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

FROM: Aaron L. Szabo, Cost Analyst /RA/
Rulemaking Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF MAY 28, 2014 PUBLIC MEETING TO DISCUSS
SECY-14-0002 ON COST-BENEFIT GUIDANCE AND
QUALITATIVE FACTORS (TAC NO. MF3312)

The U.S. Nuclear Regulatory Commission (NRC) held a Category 3 public meeting on May 28, 2014, to discuss SECY-14-0002, "Plan for Updating the U.S. Nuclear Regulatory Commission's Cost-Benefit Guidance" and qualitative factors. The public meeting was held at the NRC headquarters location in Rockville, Maryland. The purpose of the meeting was to discuss and receive feedback on: (1) SECY-14-0002; and (2) qualitative factors notation-vote SECY paper.

The meeting was attended by 22 individuals primarily representing industry representatives and NRC staff. Of the 22 participants, 13 participated in the meeting through audio teleconferencing and webinar.

The NRC presentation materials are available in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML14147A149, "5/28/2014 NRC Presentation for Discussion of SECY-14-0002 and Qualitative Factors Public Meeting."

The major areas of discussion are summarized below:

Part 1: Discussion of SECY-14-0002

- Background and history of SECY-14-0002:
 - Developed in response to SRM-SECY-12-0110, "Consideration of Economic Consequences Within the U.S. Nuclear Regulatory Commission's Regulatory Framework"

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- Current ongoing initiatives and due dates:
 - Draft replacement energy cost NUREG due later this year.
 - Draft dollar per person-rem NUREG due later this year.
 - Regulatory gap analysis is due November 2012.
 - Near-Term Task Force (NTTF) Recommendation 1.
- Two-phased approach of cost-benefit guidance update:
 - Phase 1 will focus on administrative changes and should be issued as a draft NUREG for public comment in summer 2015.
 - Phase 2 will focus on policy issues, will not be implemented until after the regulatory gap analysis is complete, and will take multiple years to implement. The NRC plan to prepare supplemental NUREGs to address these policy issues and issue these supplemental NUREGs for public comment.

Part 2: Discussion of Qualitative Factors

- Provided background on the use of qualitative factors within the NRC and other federal agencies.
- Discussed cases where qualitative factors are used and evaluation techniques that could enhance the discussion of qualitative factors that can be performed within the status quo.
- Provided NRC staff thoughts about enhancing the current process to improve transparency and to provide clarity on comparing quantitative measures to qualitative factors.
- Member from Westinghouse wanted to know if the status quo is being evaluated and expressed concern that the regulatory framework that has been around for 40 years may be changed due to one situation.
- Member from Nuclear Energy Institute (NEI) stated that while the qualitative factors discussed within SECY-12-0157, "Consideration of Additional Requirements for Containment Venting Systems for Boiling Water Reactors with Mark I and Mark II Containments," were identified and discussed within the document, a discussion of the relation between the quantitative measures and the qualitative factors was lacking. Additionally, the use of evaluation techniques appears to provide better transparency and make clearer the relation between quantitative measures and qualitative factors.
- Another member from NEI expressed interest in when further opportunities for public participation could occur in relation to qualitative factors. The NRC staff responded that any direction provided by the Commission would be implemented within Phase 2 of the cost-benefit guidance updates, and the draft revisions to the regulatory analysis guidance would be issued as a draft NUREG for public comment. The NRC staff also noted that, depending on the direction provided by the Commission, Commission directed improvements may be incorporated in regulatory actions before the Phase 2 guidance updates are published for public comments. In these situations, the public can provide their comments within those regulatory actions, as well.

Enclosure:

List of Attendees

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OFFICE	NRR/DPR/PRMB	NRR/DPR/PRMB	NRR/DPR/PRMB	NRR/DPR/PRMB
NAME	ASzabo	GLappert	TInverso	ASzabo
DATE	6/5/2014	6/12/2014	6/12/14	6/12/14

OFFICIAL RECORD COPY

LIST OF MEETING ATTENDEES

Name	Organization
Sher Bahadur	NRC
Aaron Szabo	NRC
Alysia Bone	NRC
Fred Schofer	NRC
Michelle Hart	NRC
Tina Ghosh	NRC
Andrew Pessin	NRC
Jeffrey Rikhoff	NRC
Donald Palmrose*	NRC
Gregory Trussell*	NRC
Matthew Humberstone*	NRC
Jerry Bonanno	Nuclear Energy Institute
Douglas Weaver	Westinghouse
Jason Zorn*	Westinghouse
Nancy Chapman*	Bechtel
Doug True*	ERIN Engineering
Ralph Andersen*	Nuclear Energy Institute
Shayne Tenace*	Not provided
Yuya Aoyagi*	Not provided
Leslie Collins*	Westinghouse Electric Company
Bob Meyer*	Professional Reactor Operator Society
Leon Rafner*	Certrec Corp
Dale Wuokko*	Toshiba America Nuclear Energy Corporation
Sher Bahadur	NRC
Aaron Szabo	NRC
Alysia Bone	NRC
Fred Schofer	NRC
Michelle Hart	NRC
Tina Ghosh	NRC
Andrew Pessin	NRC
Jeffrey Rikhoff	NRC
*participated via teleconference	

ENCLOSURE