


RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: COMMISSIONER OSTENDORFF
SUBJECT: COMSECY-14-0014 – CUMULATIVE EFFECTS OF
REGULATION AND RISK PRIORITIZATION
INITIATIVE: UPDATE ON RECENT ACTIVITIES AND
RECOMMENDATIONS FOR PATH FORWARD

Approved XX Disapproved _____ Abstain _____

Not Participating _____

COMMENTS: Below _____ Attached XX None _____



SIGNATURE

5/27/14

DATE

Entered on "STARS" Yes X No _____

**Commissioner Ostendorff's Comments on COMSECY-14-0014,
"Cumulative Effects of Regulation and Risk Prioritization Initiative: Update on Recent
Activities and Recommendations for Path Forward"**

I approve the staff's recommendation to combine the deliverables that respond to SRM-SECY-12-0137 and SRM-COMGEA-12-001/COMWDM-12-0002 with a common due date in March 2015.

I join Commissioner Apostolakis in supporting the points from Commissioner Magwood's vote as follows:

1. Incentivizing industry to develop enhanced probabilistic risk assessment (PRA) tools and models should remain a core objective of the merged initiative.
2. Options developed by the staff that include consideration of eliminating regulatory activities of low risk and safety significance should be put forth only if they are supported by upgraded PRA models that are properly maintained.
3. The notation vote paper should include consideration of the regulatory process changes required to support reliable, efficient, and effective implementation of the risk prioritization initiative (RPI) in the long term (e.g., modification of the language of 10 CFR Part 50.12 to obviate the need for exemptions, provided that the risk prioritization is based on an appropriate PRA).
4. The paper should provide a discussion on how corrective actions for findings, violations, and degraded or nonconforming conditions adverse to quality will be treated as part of the risk prioritization initiative.
5. The staff should provide a full briefing to the ACRS in advance of the transmission of the March 2015 paper to the Commission. Doing so will allow the Commission to benefit from ACRS views and experience.
6. The staff should provide a Commissioner Assistant's note covering relevant issues related to CER and RPI before the end of July 2014 and should be prepared to provide individual Commissioner briefings during the same time frame.
7. The staff should notify the Commission should any new issues arise in the consolidation of the CER and RPI activities.

Lastly, the staff indicated that they will shift resources from Significance Determination Process enhancements, risk-informed license amendment reviews, Fukushima Tier 3 Activities, Topical Report Reviews, Information Notices/Regulatory Issue Summaries, and 10 CFR 50.55a rulemaking activities to support the RPI which is currently unfunded in FY 2014 and FY 2015.

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the staff should notify the Commission if shifting resources to the RPI will negatively impact the efforts to reverse the backlog of licensing actions. Further, the staff should advise the

Commission of any negative schedule impacts to Fukushima Tier 3 work resulting from the reallocation of resources to support the RPI.