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January 13, 2015

Mr. Scott A. Morris
Director, Division of Inspection and Regional Support
Office of Nuclear Regulatory Research
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: NRC Working Group Recommendations to Revise the Substantive Cross-Cutting Issue Process

Project Code: 689

Dear Mr. Morris:

On behalf of the nuclear industry, the Nuclear Energy Institute¹ is pleased to respond to your invitation to provide comments on the staff's [proposal](#)² to revise the Substantive Cross-Cutting Issue (SCCI) process. The proposal was discussed at a public meeting held on November 19, 2014.³ The proposal is a good first step to address concerns about the burden and effectiveness of the SCCI process. We appreciate this effort, and applaud the working group for putting forth a comprehensive proposal.

The SCCI process was initiated in 2006 in response to Commission direction to enhance the ROP to more fully address safety culture. In the almost nine years since, both the industry's and the NRC's approaches to monitoring and managing safety culture have matured significantly. In our May 20, 2014, meeting, for example, we noted 17 ways in which the NRC now touches on safety culture through inspections and observations, and 15 ways in which licensees commonly do so. We see no evidence that the SCCI process is adding unique insights about safety culture or providing unique value as a regulatory tool that justifies continuing it in its present form or in the revised form proposed by the staff. The SCCI process has been

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

² "Working Group Recommendations to Revise the SCCI Process", ADAMS Accession number ML14328A544.

³ NRC Memorandum from Daniel J. Merzke to Nathan T. Sanfilippo, "Summary of the Public Meeting to Discuss the Nuclear Regulatory Commission Staff Recommendations to Revise the Substantive Cross-Cutting Issue Process," December 3, 2014, ADAMS Accession Number ML14328A151.

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overtaken by the maturation of corrective action processes and safety culture monitoring and management. Hence, in our view, the SCCI process is no longer necessary or justified.

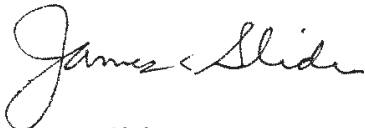
The staff has made clear it is unwilling to eliminate the SCCI process at this time. Although we disagree with that position, we welcome the staff's proposal as a step in the right direction. We hope the staff will in the future consider additional options to reduce the burden of the SCCI process, including eliminating it as no longer necessary.

Attachment 1 provides additional and specific comments on the proposal, for your consideration. Attachment 2 provides a copy of the staff's proposal with line numbers added for reference in the comments we provide in Attachment 1.

Thank you for your efforts in support of the staff's review of the SCCI process.

If you have any questions in this matter, please contact me.

Sincerely,

A handwritten signature in black ink that reads "James E. Slider". The signature is written in a cursive, flowing style.

James E. Slider

Attachments

c: Mr. Mark A. Satorius, Executive Director for Operations, NRC
Mr. William M. Dean, NRR, NRC
Dr. Jennifer L. Uhle, NRR, NRC
Mr. Allen G. Howe, NRR/DIRS, NRC
Mr. Nathan T. Sanfilippo, NRR/DIRS/IPAB, NRC
Mr. Daniel J. Merzke, NRR/DIRS/IPAB, NRC