

NWX-US NUCLEAR REGULATORY COM (US)

**Moderator: Roy Zimmerman
September 1, 2015
11:00 am CT**

**Public Meeting and Teleconference to Discuss Integrated Prioritization and
Re-baselining of NRC Activities (Project Aim Initiative)**

Coordinator: Welcome everyone and thank you for standing by. At this time, today's conference is being recorded. If you have any objections, please disconnect at this time. Thank you; you may begin.

Gene Carpenter: Thank you very much, Stedman. Good afternoon. I'm Gene Carpenter. I'm with the U.S. Nuclear Regulatory Commission. I am the facilitator for today's meeting.

This is a Category 3 meeting, so can everybody in the room hear me? Seeing nods, so I guess that's a yes. Hopefully the people on the telephone can also hear me. Stedman, can you hear?

Coordinator: Yes, I can hear you loud and clear.

Gene Carpenter: Very good. All right, very good. Before we start the meeting, I'd like to go over some of the administrivia portions of this because we are in a federal

building. If there are any emergencies, please follow the appropriate staff members -- the folks here at the front of the table -- out the door, down the stairs, and follow them out.

If you do need to exit the room for any reason to go to the restrooms, we do have restrooms outside the door. Just please let the appropriate staff member you have somebody here to do - who is the escorts. Okay, yes, if you'll give us a high five, we'll get the appropriate staff member to escort you to - back and forth -- again, security buildings and whatnot.

Again, this is a Category 3 meeting. The purpose of this meeting is for the NRC staff to share information with and seek input from its stakeholders on the existee's work. The input will assist the agency in evaluating what activities can be shed that is stopped, performed with pure resources are performed with a different priority, while still fulfilling the staff's - the agency's regulatory mission in a manner consistent with the NRC's principles of good regulation and organizational values.

To assist the participants, if you use all the questions provided on the agenda will aid the NRC staff. We request that you be as specific as possible. So, as we go through this meeting, first I'll turn it over to Fred Brown.

Fred will give us the - his presentations. At this time, we will open the meeting to questions and answers. We have people here on the telephone and as well as people here in the building.

Sorry, I'm being told to hold the microphone up a little closer. At that time, when we come - back to go to the question and answer period, I will go first to the telephone and then back to the room, back and forth, until such time is - everyone has had a chance to ask their questions or make their comments.

For the purposes of making sure everybody is heard, I will ask that you will try to refrain from going past five minutes. If we still have time at the end of the meeting and someone else would still like to have another round of conversation or have more comments, we'll go for a second round at that time. So starting in the room, again, I am Gene Carpenter with the Nuclear Regulatory Commission.

Frederick Brown: Fred Brown, NRC.

Ruth Thomas Hello.

Man: (unintelligible).

Gene Carpenter: For the people on the phone, one moment please; we'll go to you in just a moment for your - who you are.

Ruth Thomas Oh, well, actually, I didn't hear anything. Am I supposed to be hearing something?

Gene Carpenter: Okay, let's try again. Were you able to hear that now?

Ruth Thomas Yes, I can hear you now.

Gene Carpenter: Okay, thank you very much.

Ruth Thomas Thank you.

Gene Carpenter: Okay, let's go out to the people out here.

Maria Schwartz: I'm Maria Schwartz. I'm the Executive Vice-President of NTEU Chapter 208.

Eeda Overpor: Eeda Overpor, NRC.

Ruth Thomas: Ruth Thomas with Environmentalist Incorporated.

Gene Carpenter: Thank you, Miss Thomas. One moment for the people on the phone.

Rani Franovich: Rani Franovich, NRC

David Brooks: David Brooks, NRC NMSS.

Jim O'Driscoll: Jim O'Driscoll, NRC.

Robert Sun: Robert Sun, NRC.

Gene Carpenter: Trying to go through all of this.

Gina Davis: Gina Davis, NRC.

Patti Silva: Patti Silva, NRC.

Mauri Lemoncelli: Mauri Lemoncelli, NRC.

Steven West: Steven West, NRC.

Heather Murray: Heather Murray, NRC.

Larry Camper: Larry Camper, NRC.

Mirna Flores: Mirna Flores, NRC.

John Monninger: John Monninger, NRC.

Russell Allwein: Russell Allwein, NRC.

Teresa Grancorvitz: Teresa Grancorvitz, NRC.

Ilka Solorio: Ilka Solorio, NRC.

Alex Julu: Alex Julu, Curtis Wright.

Marisa Bailey: Marisa Bailey, NRC.

Mike Waters: Mike Waters, NRC.

Gene Carpenter: Okay, thank you. For the folks in the room, did I catch everybody? Yes, okay.
On the telephone, please.

Ruth Thomas: Ruth Thomas, Environmentalist Incorporated.

Gene Carpenter: Thank you.

Martin: (unintelligible) Martin, AAPM.

Gene Carpenter: Thank you.

Leslie Collins: Leslie Collins, Westinghouse.

Gene Carpenter: Thank you.

Elizabeth Kelsey: Elizabeth Kelsey, Morgan McGuire.

Mike: Mike (unintelligible)...

Man: (unintelligible).

Man: (unintelligible) Next Era Energy.

Gene Carpenter: Thank you.

Tony Lushinski: Tony Lushinski, State of Vermont Nuclear Engineer.

Gene Carpenter: I'm sorry. I didn't hear you.

Tony Lushinski: Tony Lushinski, State of Vermont Nuclear Engineer.

Gene Carpenter: Thank you.

Mike Callahan: Mike Callahan.

Lenny Suprin: (unintelligible).

Gene Carpenter: Try again.

Lenny Suprin: Lenny Suprin...

Mike Callahan: Mike Callahan, Governmental Strategies on behalf of the (D) Commission and Client Coalition.

Gene Carpenter: Thank you.

Mike Stevens: Mike Stevens, State of Florida.

Gene Carpenter: Thank you.

Rob Stewart: Rob Stewart, Westinghouse.

Gene Carpenter: Thank you.

Scott Bowers: Scott Bowers, Stars Alliance.

Gene Carpenter: Thank you.

Tim Taturiva: Tim Taturiva.

Gene Carpenter: Thank you.

Bob Lankuriva: Bob Lankuriva.

Gene Carpenter: Thank you. Anyone else on the phone? Okay, at this time, Stedman, if you'll please mute the phones. What that means is the individuals on the phone, you will not be heard until such time as we go to the question and answer period, which I will go ahead and open the phones back up again.

At this time, I'd like to turn it over to Fred Brown.

Frederick Brown: Thank you, Gene. So I'm Fred Brown (unintelligible).

Coordinator: And excuse me, this is the operator, Stedman. We actually aren't able to hear any audio coming from the room, at this time.

Frederick Brown: Can you hear me now?

Coordinator: I can hear you now. Thank you.

Frederick Brown: Is that this one?

Gene Carpenter: Yes.

Frederick Brown: Yes. So again, I'm - for those on the phone, my name is Fred Brown. I work for the Executive Director of Operations. And since June of this year, I've been the coordinator for the Project Aim 2020 activities and the executive sponsor for re-baselining. And Vonna Ordaz is here; she's my counterpart for a comp and prioritization.

We've actually merged those two tasks into a single task and that's - that single task is what we're here to discuss today. So on our first slide, we've simply repeated for you a mission of the agency to license and regulate the civilian uses -- nuclear and radiological materials in - protects in a public health and safety, and promoting common defense and security and protecting the environment.

And then, on the subsequent slide, just as a refresher, our principles of good regulations are independence, openness, efficiency in our actions, clarity in our actions, and reliability in our actions. And then, on the following slide, our organization values, which are largely internal-looking of integrity, service, openness, commitment, cooperation, excellence, and respect.

And those will be significant in a minute as I talk about what we're here to do at the direction of the Commission. Before I dive into that though, if we go to the next slide, which is Slide 5 in the package, I'll provide a little historical perspective on where the NRC is at with respect to its size and how that compares to where we've been in the past.

So this slide actually comes out of a document that's referenced in the public meeting notice - 150015 on recommendations for Project Aim 2020. But, basically, what this slide shows is that it's an agency which was started in 1975. We grew through the period of initial licensing and the post-TMI to a peak of around 3,500 people and in the mid-1980s.

And then, following that peak, there was a gradual - a decrease in activity and, hence, size of the agency - and I'm referring now to the blue bars - the vertical bars - a decrease to around the 2000 timeframe when we were down at about 2,700 full-time equivalent employees. Our budget, in constant terms, is the green line at the bottom of the graph

It fluctuated, but within a reasonably narrow band. The blue - excuse me, the red line is the budget in absolute terms. And so you'll see that beginning in 2000, post-9/11, we began to grow back towards our peak - and in fact, past our peak - and that was driven by several situations -- the 9/11 focus on security, the decision by congress and the president to move forward with licensing of Yucca Mountain, and then, after that, the nuclear renaissance in the anticipate of a large number of design certifications and combined licenses for new reactors in the country.

About 2010, we hit a peak size and peak budget. In the forward projections for new licensing construction and oversight activity started to decline. We started to reflect that, and then, the Fukushima accident, to some extent,

intervened with a decreasing size in response to the environment post-Yucca Mountain decisions by Department of Energy and the declining number of near-term new bills and declining number of design certifications.

So with that perspective, you can see that we're substantially larger as an agency than our historical norm. And we see the workload trend as decreasing rather than increasing. So the staff, about a year ago, year and a half ago recognized the need to both adjust for our new reality of work, and also to look for some lessons about how we had grown so large so quickly, leaving ourselves in a position that we needed to react to a change that caught us by surprise.

So that was the Project Aim 2020 initiative. There were a series of meetings mainly with staff, but also with quite a few external entities while - where we tried to develop insights into how other organizations look out beyond a 1 or 2-year planning horizon, to look out at a 5-year or a ten-year or 15-year planning horizon. We received about 2,000 specific suggestions or recommendations or insights, which were then synthesized into a series of recommendations and provided to the Commissions in January of this year.

The Commission reviewed those recommendations and proved, in part, many of them in a staff requirement memo of June 8 this year. They directed us to proceed with a series of activities, all of which are intended to assist with the coming budget cycles and with being - thank you, so the next slide - on Slide 6 - being prepared to handle changes in the future.

So the first thing I want to say when you look at the previous slide and listen to what I've said, I've talked about how big we are now, and we're actually smaller than we were two years ago or three years ago, but we're still large

compared to our historical norms. Is this just about getting smaller? And the answer is no; this is not just about getting smaller.

It's about being more agile, being more forward-looking, recognizing trends before they hit us in quite as dramatic a way, being better able to move resources internally as work changes, new work emerges, old work goes away. It's about being more efficient with the resources that we have, about being quicker in our decision-making and being as effective or more effective in the quality of the work that we do in licensing and in oversight, in outreach, and all of the aspects of our missions.

So if we go to the next slide, which is Slide 7, I'm going to talk about - a little bit about the products again, and then on the next slide, I'll provide a little more context around how the products fit in. But for this combined set of tasks that are referred to as common prioritization and re-baselining, there are three major outputs.

The first is a common prioritization list of all of the activities that we do, all the work that we do that we can use in budget execution space or in - within any year when new work comes in the door to be better able to move resources to doing that work with either minimal impact or much clearer understanding of the impact of making those moves. So a common prioritization document in process is one output.

We are also looking at budget -- both budget execution and budget formulation -- so the timing works out, that there are three years of budget in play. We'll be starting our fiscal year 2016 budget execution year on October 1. The appropriation, of course, is, by law, supposed to be around that time.

And we will, we believe, have opportunities in budget year, fiscal year '16 to identify efficiencies, to implement the effect our current year costs and level of work. It will line up with the planning for fiscal year '17. The results of our products will line up with fiscal year '17 planning, and also fiscal year '18 budget development by the staff and the Commission.

So in December of this year, we will have a product that assists the staff with common prioritization of work. And in April, we will have recommendations for the Commission that impact those three fiscal years. In addition to these two tasks, there are other tasks within the Project Aim 2020 overarching envelope that also look to efficiency gains out into fiscal years 2019 and 2020.

And so this is not - it is - this effort's a one-time effort with respect to the three most current fiscal years, but there are other longer-term improvements that will be working in parallel, and subsequent to this activity - so, again, common prioritizations. One major product input into our budgeting process is the second. And then, the third goes to the agility that we talked about, and that's better definition of the critical skills that we need within the staff to be able to do the work of the staff and our core mission.

So let's talk a little bit, then, about what this re-baselining and common prioritization task and activity are. The first step on Slide 8 is - to identify work. And I don't mean, simply, to know what we do, but, rather, to know what we do and then think about how we do it.

What process steps do we use, how many resources do we use, how do we go about doing the work, what's the scope of our activities for the work that we do? And then, with that, we can do common prioritization and we can also look for efficiencies. The next step is the prioritization, which is the common

prioritization that I referred in - to in terms of ranking all of the things we do relative to itself.

And then, the third box is to shed low priorities, which is apply the efficiency gains -- again, immediate gains in fiscal year 2016, gains available for Commission consideration in 2017, and for budget formulation in 2018. And then improve efficiency, again, are those more detailed business process engineering efforts that can't be implemented effectively by 2017, but, which if we start now, should be in place for improvements in 2019 and 2020 -- so a bit of a continuum of activities for re-baselining.

So, in that statement on Slide 8, just before I go to the next two slide, where we're at is at the beginning of the identifying work and prioritizing it. And that's what leads us to this meeting today and the public request for a comment period for input from stakeholders.

We, obviously, have a very close proximity to the work we do -- a lot of familiarity with it, certainly, from the staff subject matter experts and from the line managers who oversee the work. But external stakeholders have an opportunity to see our work product in a way we don't. And to provide us insights on what we do that will give us a different perspective than what we bring.

And that's both in terms of identifying the work and prioritizing it. So that, then, takes us to Slide 9, which is the first of the four questions that we requested input on. I'm not going to read the questions; you have them in your slides, you've seen them for the last couple weeks. But I will take this opportunity to talk very briefly about a little bit of a timeline again.

We've asked for input by September 15 and the reason for that is that input will be provided to the line organizations within the NRC on September 16 to begin looking to break work into sub-portions or sub-products to identify efficiencies, to identify areas where we can change scope to prepare for common prioritization.

There's only a three-week window for the offices to work together to do that within each of the business lines. And then we have another three-week window to actually do the ranking for common prioritization. And then, we have another three-week window to combine all those business lines into a single comprehensive list of activities for the agency that is our - part of our December product.

So there is not a lot of time for the staff to do this work, and, therefore, time is of the essence on receiving input. So that's why we got our notice out before the meeting, why we scheduled today's meeting to, first off, answer any questions that you might have about the questions themselves, and then, secondly, to provide an opportunity to provide input here in a public setting to us. But, again, the public comment period - or the opportunity for public input, I should say - actually goes through September 15.

So that was the end of my prepared comments. And Gene, if we could kind of break into two questions. The first question, if we could, see if anyone has a question about the questions. And then, once we've had an opportunity to answer any of those, then move into the solicitation of input.

And I should also ask that we are in data gathering mode today. We don't plan on engaging with any of the stakeholders on their suggestions - actually, none of us in the room - at the table anyway - are directly involved with the re-baselining activity. We're more providing project management.

There are some interested staffs in attendance to hear your comments directly. But the purpose of today's meeting is not to discuss the input; it's simply to gather the input. So now, I'll finally stop talking, for the moment.

Gene Carpenter: Okay, we'll start in the room first. Anyone at the table have any questions about the questions? John. Please identify yourself when you...

John Butler: First off, can you hear me? All right. John Butler, NEI. The question I have is on the prioritization re-baselining. Are you targeting or looking for prioritization of - and I'll use the word processes - or specific tasks?

And if I could answer my own question, ideally, I would like you to be looking at both. And what I mean by that, I'll use an example of the regulatory guide periodic updates. That's a process, so there - I think there are some ways that that process can be improved to make it efficient going forward.

But there also may be specific reg guides that are being updated that we can justify as being low priority. So, does that make sense?

Frederick Brown: Yes, it actually - it makes a lot of sense. And in fact, activities in this sense means both. It means work product and it means the processes that we go through to develop those work products. So the simple answer is yes, to the example that you provided, we are working on both.

And they will both be - both components of activity will go through common prioritization and the - look for what we can (unintelligible).

Gene Carpenter: Okay, very good. Let's go to the telephones. Stedman, anyone on the telephone have a question?

Coordinator: If participants on the phone would like to ask a question, you can press star 1 to do so. Once again, if you would like to ask a question on the phone, please press star then 1.

Gene Carpenter: And again, this is just questions on the questions. We'll come to the comments in just a moment.

Coordinator: We have...

Gene Carpenter: From the silence, Stedman, I take it no one pressed.

Coordinator: We have one question in queue. One moment.

Gene Carpenter: Very good.

Coordinator: Our first question comes from Tony Lushinski. Tony, your line is open.

Tony Lushinski: Hi there. Yes, Tony Lushinski. I'm a State Nuclear Engineer for Vermont. I appear to be coming into this rather blindly. During Mr. Brown's presentation, he was referring to a slide package that I do not apparently have. So my question is where do I find the four questions?

Gene Carpenter: I can actually answer that. If you'll take a look at the public meeting notice, the notice itself has the four questions on it. It also has an attachment with some background materials.

Tony Lushinski: Okay, this is by clicking on the "More" tab (unintelligible).

Gene Carpenter: The NRC public meeting site, yes.

Tony Lushinski: Okay. Okay, fine. And I will review those. And if anything comes to mind, I will certainly forward comments on that. Thank you.

Gene Carpenter: Thank you very much. Back to the room. Doug.

Doug Weaver: Hi. Doug Weaver, Westinghouse. And this may be the same question as John, but I'm not sure. So I solicited internally within Westinghouse for some things people might feel are appropriate for this. And when I got it, it wasn't what I was expecting.

And so I'm trying to figure out if this is the right box to put it. So that's - so the question is, so for example, licensing -- we submit lots of topical reports. We want you to keep reviewing the topical reports, but I got a lot of feedback on how that's done. So, in other words, if there's something that you're doing that we want you to keep doing but maybe it's not, from our perspective, exactly in keeping with the principles of good regulation, is this an appropriate form to provide that feedback or does that go somewhere else?

Frederick Brown: Yes, this is Fred Brown again. And yes, this is an appropriate forum that - so for the (unintelligible) anyone that didn't have an opportunity to see the questions, one of the things that I didn't talk about because it's in the background material is what we are looking out is how we do our work and the way we do our work and how that ties back -- how directly it ties back -- to our mission and the principles of good regulation and our values?

And so if there is a suggestion in the area, for instance, topical report review - that in the view of the suggestor would allow us to have a more efficient use

of our resources and your resources, then that is the sort of information we're looking for. It will be considered in creating a sub-product of work or type of work that would then be considered against that criteria of mission values and principles, and potentially shed.

Gene Carpenter: Okay, back to the telephone. Stedman, anyone else have a question?

Coordinator: Our next question comes from Michael Callahan. Your line is open.

Michael Callahan: Thank you. With respect to - especially Question 1 - has the staff set any goals or ideas about any measure of work that can be shed going into this?

Frederick Brown: This is Fred Brown again. There is not a numerical target established for shedding, no. What we have done, internally, is to establish some objectives with respect to how we divide our work up and prioritize it, not with respect to what changes are made, but as an internal control kind of process to assure the rigor of our internal activities.

So, no, there is no target, there's no goal, there's no right answer or - and yes, we are taking this seriously and putting internal controls in place to monitor how effectively we scrub our work.

Gene Carpenter: Okay.

Michael Callahan: A little follow-up, if I can. Is it your intention to have this completed in advance of, say, February so that - and some feedback from the Commission - so that this can be factored into the '18 budget - I'm sorry, the - FY '18 budget preparation?

Frederick Brown: So we will complete in April, but we will have been in the latter stages of putting together our recommendation at the same time the staff is preparing its FY fiscal year '18 budget proposal for the Commission. The Commission will have the paper and recommendations during its deliberation on fiscal year '18 budget.

So it's not February, but the - but I think the answer is yes to your underlying question.

Michael Callahan: All right, the intention is to incorporate these findings into the '18 budget preparation.

Frederick Brown: Correct.

Michael Callahan: Thank you.

Gene Carpenter: And thank you. In the room, any other questions on the questions?

Glen Kaegi: I don't know if it fits in that category - Glen Kaegi from Exelon - but on your Slide 8, you talked about the re-baselining process. And in one category, you have shed low priority. And I'm trying to get an understanding of what that really means.

Does it mean that the activities that don't - that are not above the line, if you will - are they permanently removed, do they stay in the process so that - in future years, you know, you re-look at that same bucket? And it would seem to me that if your goal for Aim 2020 is some degree of re-baselining or reduction that you should move those to a permanent elimination. Thank you.

Frederick Brown: Yes, Fred Brown again. So the Commission specifically asked us to look at work that we could shed, reprioritize, or perform with fewer resources. So it is possible that there will be activities that we look at performing less often.

Work that's shed will be shed. It - work that we deprioritize might be stretched out in its duration, but I - and work that we perform with fewer resources might be stretched out. I - so I believe, Glen, if your underlying question was are we just going to build a backlog of activities that we'll go back to, the answer is no.

However, there could be things - and just totally hypothetical - the regulatory information conference, we might do bi-annually or tri-annually rather than annually. So - it - we would be setting it aside one year, but doing it the next; it would be less frequent.

Glen Kaegi: So just for clarity and my understanding of your response is you're saying there is a bucket, if you will, for permanent deletion -- items that do not reoccur or show up year after year during this process.

Frederick Brown: Absolutely.

Glen Kaegi: Thank you.

Gene Carpenter: And just to clarify, Fred, it's not saying that we're not going to be doing the regulatory information conference, it's (unintelligible) an example there. Going back to the telephones, do we have any other questions online?

Coordinator: Our next question comes from Lenny Suprin. Lenny, your line is open.

Lenny Suprin: I'm sorry. Actually, my answer - or, question has been answered. Thank you.

Gene Carpenter: Thank you. That was easy. We'll go back to the telephones, then. Is there any other one?

Coordinator: Our next question comes from Tony Lushinski. Tony, your line is open.

Tony Lushinski: Okay, I think this factors into what has just been discussed, but the statement of shedding low priorities. My question there is even - you know, if a decision is made to shed a low priority, will there at least be some tracking done of the fact that this was a priority at what - at some point and it was deemed to be not significant for future reference?

And the reason I point this out is I will - from my understanding, reactor decommissioning rulemaking was evaluated as a potential priority throughout the first decade of this century and there were always higher priorities that need to be - needed to be addressed. And as a result, here, we now have a number of plans in decommissioning's and the rulemaking is still catching up and there was opportunity to evaluate this rulemaking, you know, in - you know, at least the past 12 years.

And, admittedly, higher priorities have precedence.

Frederick Brown: This is Fred Brown. And that's a really great question. So let me answer it in two ways. First off, for something like an approved rulemaking activity, the Commission's specifically asked us not just to stop doing something or to recommend that they stop doing it. But when we make the recommendation to shed or stop something, to provide the Commission the background on why we were doing it in the first place and what's changed -- why we're now recommending stopping or shedding that activity.

So there will be a documented mechanism within the budget process, which, of course, is not public, but a record of what decisions are made now -- kind of the immediate answer to the first question. But the - under more - the broad point, though, on how do we look forward and know what - urgent today but - is important today and it's going to be urgent tomorrow, that is actually a part of the Aim 2020 project intent - was to be able to better identify those things.

So I will say that as we have developed our internal tools to go through this exercise, we have - you know, there's a mission requirement to do rulemaking. And we are prioritizing those things that may not be near term, but which have a core connection to our mission, not at the bottom of our priority list, but a little bit up from the bottom of the priority list, in order to prevent taking work that's not urgent today and not doing it until it becomes urgent. So your fundamental point is a great one.

We do recognize that and we are trying to build into our process steps to mitigate what can go wrong when you're in a mindset of stopping doing work. And again, that's why I would say that to a large extent, we're really trying to find the scope and process things that we can stop doing rather than the core products to stop doing because as long as we continue to do our core products, then we're much more comfortable that we're meeting the mission and the principles of good regulation, as well as our values.

That was a rather long-winded answer; I hope that it was a quarter as good as the question was.

Tony Lushinski: Okay thank you.

Gene Carpenter: Doug, to the room. Back to the room. Doug.

Doug Weaver: Thanks. Hi, it's Doug Weaver again from Westinghouse. I just - this is just a - I guess it's a request - in terms of trying to make our input better. In the SECY paper 0105, there's a statement that, you know, you solicited. You basically asked these same questions internally and that you were going to share good examples of input that you got.

Can you share those good examples publically, because as I write this letter to - you know, to the extent, I see concrete examples that you think are good, I think that'll help me frame our response better as well. Thanks.

Frederick Brown: Our take the request under advisement and we'll have to think about that. But I understand the value.

Gene Carpenter: Okay, back to the telephone.

Coordinator: No questions on the phone at this time.

Gene Carpenter: Okay, thank you, Stedman. Last round. Very good. Ready to go to the - okay, we are going to go to the comment period of the - of this session here. This is where we're seeking your actual input.

Again, I'm going to ask that everyone who participates on this, first off, state your name whenever we get - you start your comment. Secondly, to try to limit to no more than five minutes. We have about - if my count here is correct, about 40 people both in the room and online, so I'd like to make sure that it - as many people who want to get a comment in do have an opportunity to do so.

So first off, if folks in the room don't mind, we're going to go to the telephones. Stedman, do we have anyone who'd like to make a comment first?

Coordinator: And as a reminder, if you would like to make a comment on the call today, please press star then 1 and record your name. To make a comment, please press star 1.

Man: I was wondering if Tony Lushinski from the State of Vermont whether he found these questions or he needs it read to him?

Man: Okay.

Man: Do you have it now?

Gene Carpenter: Gentleman, from State of Vermont, did you get the questions? Did you find those? And of course you'll have to do star 1 to get to us. So - Stedman, no comments?

Coordinator: We do have a comment from Tony Lushinski.

Gene Carpenter: Go ahead.

Tony Lushinski: Yes, just one thing, so you folks are aware of this, when you do hit the star 1 and you provide your name, the person providing their name does get cut off from the active discussion. So I'm jumping back and I'm hearing my name here. The short answer to what was asked before, in case you didn't hear it, yes, I have found the questions.

Thank you very much for the information to direct me to that. The only additional comment I have is just the other part of a point that I began in my last question. Right now, the NRC, in establishing its work priorities apparently has some formulas for establishing priorities.

I don't know what they are but they've then explained to me that this is how prioritization is done. I do hope that this project does look at those prioritization formulas and maybe put some, I don't know, hold items - I don't know what the correct terminology would be - that if you see an item that is coming up as a low priority or, you know, three years, four years, five years, consecutively, maybe that's a point to say, "Hey, wait a minute. Why is this always here? Should we make it a higher priority simply because the question is always coming up?"

And that's the extent of my comments here today.

Gene Carpenter: Okay, well thank you very much, sir. We'll go back to the room -- comments in the room.

John Butler: John Butler. The last question kind of reminded me of a question. Obviously, I have a number of questions I'll provide by the 15, so my intent here is to prioritize my questions with the limited amount of time.

The prioritization process, I hope that whatever is being looked at is a little bit more effective than the common prioritization of rulemaking process. That's one of the areas I'll be commenting on. That process, in my mind, can be improved and I'll provide some recommendations for how it can be improved.

But there are some clear examples of where rulemakings that were ranked fairly high through that process have subsequently been determined not to be warranted and have been suspended. So, you know, I can point to examples where, you know, there's clearly the need to improve the fidelity of the process, given the number of rulemakings that the staff is currently looking at, which, you know, by some measures, is over 80 rulemakings.

You know, there's a need to prioritize that work and so that'd be one area I would comment on. And a related area, if I could continue - I don't want to exceed my time - regulatory guides and, to a certain degree, new regs are used to provide guidance for meeting the regulations. As new regulations are put forward, I can understand the need to develop the reg guides in concert with that rulemaking.

So that is understood. But there's also a regulatory guide update process. And I think there is - what the intent of that process is to periodically review a reg guide - the periodicity is like five years - and make the determination whether or not that reg guide needs to be revised, left as is, or even withdrawn. My - I'll be making a number of comments on that process, but one of the things - one of the themes of those comments would be to look at the reason reg guides and, some degree, the new regs are there.

They're to guide the licensees. So they are, in effect, a service to the licensee to assist what that - the - job that that licensee does - the work that the licensee does. But the process that's used in the reg guide update doesn't take that into account.

So I'll be trying to make that point a little bit clearer. There are instances where reg guides have been updated for little more reason than they were old - out of date. The question of whether or not the reg guide is even used by any licensees doesn't seem to enter into the determination.

So that'll be the flavor of those comments on the reg guide and new regs. I'll stop there.

Gene Carpenter: Okay, thank you sir. We'll go back to the telephones. While you're doing the appropriate star 1 to get back to us, let me remind people on the telephone that you can also e-mail comments to projectaimresource -- that's projectaimresource - all one word - @nrc.gov. Stedman, do we have anybody else looking to give a comment?

Coordinator: We have a comment from Michael Callahan. Michael, your line is open.

Michael Callahan: Thanks a lot. And the decommissioning client's coalition will stand upon some preliminary comments we've put together over the past week by the 15. But our early ones were looking at ensuring that resources are available -- percent yields, storage, and transportation licensing actions that is enhancing as priority.

I support the Yucca Mountain application and proceeding and also support the consolidated armed storage application - or applications - that will be available. We're also want to comment - we'll also be commenting that the SRM on the decommissioning rulemaking was quite expansive, and that that rulemaking ought to be focused, in our mind, on taking care of those - on codifying the exemptions that have been historically granted because of the reduced risk to - the reduced risk of any accident or any release, etcetera.

We're also going to comment on the ISFSI security rulemaking. That's been going on for some time, and it seems to us that little more needs to be done other than codifying the existing orders that are in place. And then, finally there's this larger, what we'll - we will make a comment on the larger risk management regulatory framework effort that's been underway.

And that seems to respond in non-reactor world, a lot of straining and effort on - or struggling to come up with how you would apply defense into

(unintelligible) concepts to the non-reactor world. And our observation is that in many respects, the defense in depth has already been built into these most passive of nuclear operations - that is, for storage and casts, etcetera, or in placement of low-level waste facilities, etcetera.

So those will be some of the things we'll start out with. We're going to attempt to explore a little bit more of the corporate support question that you're asking at the end - in the fourth question you asked because you rapidly shift from risk to corporate support. And if you could provide any guidance on what you're referring to or maybe break that out as a separate sub-question.

But it just seems to get muddled when you're talking risk in technical items. And then, ask to apply it also to corporate support. That's it, thanks; appreciate it.

Frederick Brown: And Gene, if I could - so I said that we were done talking - you've heard more than enough from me already this afternoon. But I'm going to take that last question as a question about the questions and provide a little bit of a response before I turn my mic back off again.

So the language that we included in the public document that we put out with the questions came from the Commission from the staff requirement memo. And it actually attempted to cover both corporate and regulatory programs in a context that made more sense the way it was written. We thought that the concepts were important and while most of our traditional stakeholders are the regulated community and the NGOs and public interest groups that we deal with quite often, we also have business stakeholders that we do business with and on the corporate, you know, business side of our organization.

And so we included those words, not with the intent to muddle for the regulatory folks, but with the intent to be a little more broad to stakeholders that might do business with us, who might have comment on our application in corporate space of a non-risk-informed approach to contracting or to obtaining services. So I hadn't really thought about it until a question - I think the question - you know, the observation's a good one for most of the organizations today...

Based on a list of how folks identified themselves, you really don't have to worry about the corporate piece; there was a separate target audience for that. And my apologies; I should have been a little clearer in breaking that up in the meeting notice.

Gene Carpenter Okay, thanks, Fred. And back to the room. Do we have any more comments?
Okay.

Glen Kaegi: Yes, this is Glen Kaegi again. And building a little bit on what John Butler said, if you look at some of the rulemakings that we would actually - Exelon would suggest actually an elimination of some or sample. If you look at the current rulemaking efforts on radiation protection and those assessments already all active effluence, it appears that those rules are really just to come in alignment with the 2007 recommendations of the International Commission on radiological protection.

It really does not change the standards in such a manner that would improve the health and safety of the public or the workers of the plant. When we did a rough base cost estimate, it would be approximately 3 billion per plant to implement those, and we would recommend that you eliminate those. Also, if you look at the Part 21 efforts, I think that you can accomplish that with regards to guidance versus actual rulemaking.

I don't believe the process is broke and I don't think that was the intent of the rulemaking efforts. So we would recommend that that also be eliminated. And you look at each one of them with the same ones going through your list and determine which ones can be put in, what I spoke of earlier as, the permanent removal bucket. Thank you.

Gene Carpenter: Okay. Thank you very much. Going back to the telephones, do we have a next one?

Coordinator: Yes, Michael Callahan has an additional comment. Michael, your line is open.

Michael Callahan: Thanks. And I just wanted to follow up and thank you for your explanation. I would ask you to think about that a bit. Corporate and infrastructure programs comprise such a large element of the agency's fee base that it certainly has an impact that goes beyond the way you describe it.

That's certainly part of it but I do think that perhaps the regulated community has some observations to make on the way the corporate support is playing out in the agency's day-to-day operations, etcetera. So you might want to devote a little bit more thought to that as to how to solicit and how to parse out exactly what contributions the regulated community might make here.

Thanks, appreciate it.

Gene Carpenter: Thank you. Just in case you couldn't hear the rattling here, we were all nodding our heads, so thank you very much for that. John, (unintelligible) you said you wanted to go next.

John Butler: John Butler, NEI. Kind of following up on Glen's point, we will likely also provide specific recommendations of activities, rulemakings, in some cases, that should be terminated. But it kind of goes back to my first question of whether or not we're talking about process or tasks.

Each of these rulemaking - in some cases, a rulemaking are in the public comment period and those comments are still being collected. So it would be, while we can point to reasons, those reasons, probably, are also being provided as part of the public comment period and are being evaluated as part of the process, there.

So, you know, there's a potential to kind of get out of process by tackling it through this process versus the rulemaking process. But my hope is that the comments that we provided will at least identify, going forward, how that process can be improved - how the evaluation of these rulemakings can be improved, maybe make sure that as they come forward for this rulemaking, there's a better rationale and reason for the rule changes and etcetera, etcetera.

Bottom line is we'll be providing both comments on the process in the specific activities.

Gene Carpenter: Thank you very much. Go to you next, Doug, but first to the phone, okay. Thanks. Back to the telephones, Stedman.

Coordinator: No comments at this time.

Gene Carpenter: Very good. Doug.

Doug Weaver: Yes, hi. This is Doug Weaver again - Westinghouse. I - so this thought about - I think most of us here understand oversight and licensing and rulemaking

security, right. But this other part that's a big chunk of the agency, I think most of the external stakeholders are probably less familiar with the products that fill in those areas.

And as I read the SECY paper, it occurred to me that when you look - and I think they mentioned a number of, like, 200 products that are in that group - sharing what's in that other stuff might be an effective way to say, "Look, here is - here are the things we're doing today so that people can effectively target their response towards, you know, I'm commenting on this piece of the budget that, you know, is represented by line item whatever."

I think that's not a level of detail that most people have seen. And if you're just looking at congressional budget justification and things like that, you never get down to that level of granularity. And to the extent that you're looking for very specific and targeted comment, it seems that you need that granularity to give you what you're looking for. Okay, thanks.

Gene Carpenter: Thank you. (unintelligible) in just a moment; back to the telephones.

Coordinator: No comments in queue at this time.

Gene Carpenter: Okay, thank you.

Nima Ashkeboussi: And this is Nima Ashkeboussi with NEI. Just to piggy-back on Doug's comments, an example where we've seen good process at NRC with informing stakeholders of activities with the Division of Fuel Cycle, Safety, and Safeguards, in a background review, they provide a good overview of all regulatory initiative. They are ongoing and I think this is a good practice to extend to the other business lines in the agency and to provide some specific

examples of where we believe there are very low-priority items going on right now.

You know, we would think that the revised fuel cycle, oversight process that's been ongoing since 2008 is a very low-priority item that effects a very small number of licensees. And as it is right now, not all licensees would even be part of the new RFCOP process.

So we think that's a low-priority item and the SRM that came out on that identified the current oversight process for fuel cycles was adequate to protect public health and safety and security. Another item that we believe is low priority in the fuel cycle area is with a dermal and ocular standard. That hasn't been - a clear rationale hasn't been provided to industry that would justify continuance in this area.

And we also second Exelon's comments on Part 20 and Part 50, Appendix I -- Commission the staff identifies the current regulations in place are adequate to protect public health and safety. And with Part 21, we believe that the objectives can be reached through guidance, not rulemaking. And a fuel cycle piece of Part 21, we haven't seen the justification that fuel cycle industry has misreported any Part 21 event that would justify changes to the regulations for them. So thanks.

Gene Carpenter: Okay, thank you. Going back to the telephones, anyone on the phone?

Coordinator: No comments from the phone at this time. However, just as a reminder, participants, to make a comment, you may press star then 1. Thank you.

Gene Carpenter: Thank you. Back to the room.

Roy Zimmerman: Did I had something to - this is Roy Zimmerman, NRC. (unintelligible) I go this one is a follow-up one with you and you can make sure (unintelligible) full understanding. Was your comment primarily related in the corporate area as compared to the technical you felt it was not as transparent - not as much information to be able to make input on - or was it even splashing over into the technical area?

Gene Carpenter: It was primarily focused on the corporate support.

Roy Zimmerman: Okay, I just...

Gene Carpenter: Yes, I just think as a community, there's less - there's less interaction.

Roy Zimmerman: Right. I just wanted to - confirm. Thank you.

Glen Kaegi: Yes, Glen Kaegi again. I'd like to respectfully request that the NRC consider the elimination of maintaining their SPAR risk models. If you look at the industry models that are used, they're obviously plant-specific, quite unique, and used for more than just the calculations NRC uses.

I think that you could gain some - quite a bit of savings from that and you'll also find, I believe - and have found - that our models are more accurate because we develop them, again, plant-specific and put an awful lot of detail and time into that. And I think the models can stand up to inspection without difficulty and I think that would be quite a savings to the agency. Thank you.

Gene Carpenter: Thank you very much. Back to the telephones.

Coordinator: There are no comments or questions at this time.

Gene Carpenter: Thank you, Stedman. You changed your voice. Back to the room.

John Butler: John Butler again. One of the areas that will be providing comments on is in the oversize of the inspection area. We've looked at the - a trend - unfortunately, an increasing trend in the inspection hours per site - since around 2000 -- the initiation of the regulatory site process.

One of the comments will be on the transparency of what that inspection data. You know, you can identify some sub-categorization of the inspection hours. And it shows that the baseline inspection hours have been holding relatively steady.

So there hasn't been an increase in the baseline inspection, but there has been significant increase in a category of inspection hours called other. So there's a need for greater transparency on what other includes in the inspection process. But I think the major theme of our comments will be the need to evaluate the resources used in inspections for a - an industry that has kind of maintained a very good safety record.

This should not be a significant increasing trend in inspection hours -- certainly not without greater explanation of why that trend is there. With, you know - looking back on, you know, the staff activities to evaluate the inspection program, there has been efforts - good efforts - to evaluate the inspection program. And they focused primarily, I think, in increasing the efficiency of the inspection process, but that primarily results in a reallocation of inspection resources to make, you know, the inspections more efficient and effective.

But cost, you've seen this overall trend. I think there needs to kind of be a change in the mindset of that evaluation to, in effect, reduce the inspection

resources where they're unnecessary. I think with that as a mindset, there can be a decrease in the overall total inspection hours.

Gene Carpenter: Okay, thank you. Back to the telephone, Operator.

Coordinator: At this time, there are no comments.

Gene Carpenter: Thank you very much. Doug.

Doug Weaver: Hi. Doug Weaver again. So - this discussion prompted another thought here. And we - Westinghouse will send in a letter which documents these things more firmly. But I think as you do the common prioritization that - having some familiarity with the NRC budget process, I think it's - in the past at least - you haven't really looked at it was kind of what was budgeted last year?

There hasn't really been a hard look at what were the expenditures. You may have budgeted 50 or 100 FC for an activity and then spent either more or less on that activity. But then, when we go and do the budget for the next time around, there's not - it doesn't reflect the reality of hey, I budgeted 50 for this, only spent 25, the request comes in for 50 again, which may be right because there was a dip in that particular year.

But it may be reflective of, you know, a broader trend. So my comment is that you look at the actual, you know, hours or dollars spent on activities as you think about what their true cost is when you're looking ahead. I think that will help, you know, in terms of the accuracy of the forecast. Thanks.

Gene Carpenter: Thank you very much. Back to the telephone, Operator.

Coordinator: And once again, to ask a question or make a comment, press star then 1.
Currently, we have no comments.

Gene Carpenter: Okay, very good. Before going back to the room, Doug said something about sending a letter and John and Glen have also said that also. Just a reminder, if you take a look on the public meeting announcement, there is a address there listed under comments.

It says mail comments to ATTN: Fredrick Brown, Mail Stop 016E15, U.S.
Nuclear Regulatory Commission, One White Flint North, 11555, Rockville
Pike, Rockville, Maryland 20852-2738

Frederick Brown: Is it too late for me to change that?

Gene Carpenter: No it's much too late for you to change that. And you can also e-mail, again, to projectaimresource@nrc.gov. Back to the room.

Glen Kaegi: Yes, this is Glen Kaegi again. And you know, Fred, earlier, I think you mentioned the efficiency aspect of it. And a couple things we'd like to offer is the NRC should, to the best of their ability, adopt a - some form of policy, if you will, that once in a amendment, a (halar is assigned to a reviewer. That particular reviewer should stay with it through to completion.

We have seen, in the last few years, where the products continue to shift form hand to hand. And as that occurs, there are substantive delays in those products -- some, well beyond your typical metrics. And we would recommend that you look at can you do something different so that we're not starting from scratch in each and every case that we've experienced that?

We do have one particular one that I've been following now for three years. It's gone through three sets of reviewers to the point where, in some cases, verbally, we get repetitive RAIs, which would indicate that there was not a clear, crisp handoff between the two. So I would ask you to look at that.

And also, I think you heard Doug mentioned earlier about the appreciation of your approval of the process for topical reports and that helps us quite a bit. However, we have seen some cases here in the last couple three years where the agency, when we sent - when we send in something, for example, like a cohler tech spec that followed - clearly followed the topical report, that the reviewers are actually asking for all the calculations and appear to be trying to substantiate the topical report that was already approved.

And so the amount of time it's taking to get things like (cohlers through is becoming excessive. And I think that maybe it's just simply a practice or a misunderstanding, and in some cases, the reviewers may be moving into more of an inspection position. Thank you very much.

Gene Carpenter: Thank you. Back to the telephone, Operator.

Coordinator: There are no comments or questions at this time.

Gene Carpenter: Okay, Fred.

Frederick Brown: Gene, if I could have the operator take the control system off for a few minutes. We've been talking to Miss Ruth Thomas and she was planning on asking - or providing some comments and she may be having trouble with the star 1. So if we could allow her direct access at this time.

Coordinator: Yes.

Frederick Brown: I promised her she'd have an opportunity.

Coordinator: One moment please. And if you did need an open line during this session, please press star then 0 so I can open your line.

Gene Carpenter: Miss Thomas.

Coordinator: It does look like Miss Thomas had been connected earlier. The line she was on is no longer connected. So she may have dialed back in. You would need to press star 0 once again to have your line opened.

Gene Carpenter: We'll wait a moment. Okay.

Coordinator: We do have a question, however.

Gene Carpenter: Excellent.

Coordinator: Or a comment. Please stand by. Bob Link with AREVA, your line is open.

Bob Link: Thank you. I just wanted to add an additional kind of ditto to both Weaver's comments and especially Nima from NEI's comments on Part 20 and Part 21. But an additional specific comment, there's a ongoing dialog which we do appreciate, but in an ISG, regarding the dermal and ocular hazards, which I would say is non-productive - in fact, in some respects, I believe somewhat counter to overall safety - which should be put on the list for further evaluation for suspension. Thank you.

Gene Carpenter: Thank you very much. We'll go back to the room. In the meantime, if anyone on the phone would like to get in the queue, please go ahead and press star 1 or star 0, Operator?

Coordinator: Star 1 to get into the queue, star 0 if you need immediate assistance.

Gene Carpenter: Thank you. Back to the room.

John Butler: John Butler at NEI. It wasn't part of this activity, but there has been some Commission direction to look at the - and revise the charter for the committee to review generic requirements. I will be providing some comments - our perspective on the - what we see the potential role of CRGR, or more specifically, a return of CRGR to its original charter and role in many ways.

So is that something that will be considered as part of this Project Aim process? Or is that a separate process totally?

Frederick Brown: It's actually separate, John.

Gene Carpenter: Can I indulge upon you to pass those comments onto the appropriate parties?

John Butler: You may.

Gene Carpenter: Good. Thank you. Back to the phones.

Coordinator: There are currently no questions or comments in queue.

Gene Carpenter: Thank you very much, Operator. In the room.

Glen Kaegi: Yes, this is Glen Kaegi again, if I could, please. I appreciate the time. As you know that when inspections - in the inspection process, if a station performs poorly in a certain area, you can shorten the interval for when you come back and look at the - look at them again.

But what I would recommend is is - and particularly in things like annual inspections, and maybe, for example, RP but to the other areas as well - that if you see year over year over year where there are no performance issues or just simply minor things of very low safety significance, I would suggest that why don't you consider a process where on an individual plant basis, you can stretch the interval in six months or annual increments.

And of course, if at any time there's either a performance issue that is - reveals itself during that window or if you find one during the inspection process, then you can certainly return back. And I think what you'll find is is that you may find, in large numbers, where you could reduce the intervals without having any impact to the health and safety of the public. Thank you.

Gene Carpenter: Thank you very much. Back to the telephone.

Coordinator: There are no comments or questions at this time.

Gene Carpenter: Thank you very much. Room.

Glen Kaegi: Don't want to hog the microphone but I have one more that I would offer. Here's something that I would think that maybe you could do a little more of, but then, in the end, it may help you accomplish your goal. And specifically, I would recommend that the NRC apply more resource to approving the - to 505 - if (unintelligible) 505 was associated with risk-informed tech specs.

And then if you do that in a manner where you can set it up such that other plants can come behind in series, somewhat similar to ITS. And what you'll find over time is that it may significantly reduce or eliminate the need for emergent (lars, NOEDs, and things like that that are done under a sense of urgency. So I would recommend that you consider making sure that that's above the line and that you carry forward expeditiously on that.

Again, thank you.

Gene Carpenter: Thank you very much, sir. And back to the telephone, Operator.

Coordinator: At this time, there are no comments or questions.

Gene Carpenter: Thank you very much. Roy.

Roy Zimmerman: Glen, could I clarify in your earlier statement about the inspection frequency? Were you primarily looking at regional inspections or were you considering residents in there in your thought or was it primarily in - regional?

Glen Kaegi: Yes, for me, it was primarily regional. You know, when you get your letters and you see what you're going to be inspected to that year. If we could reduce the intervals based on safety significance and performance, then that - it will help you, from a resource perspective, and it'll also help the space, and particularly those that nowadays you'll find have some economic challenges.

Roy Zimmerman: Thank you.

Gene Carpenter: Okay. Since Roy had the last one, anybody else in the room? No. okay, we'll go back to the telephone.

Coordinator: There are no comments or questions.

Gene Carpenter: Okay, thank you. Room. We're out of questions and comments already. Very good. Operator.

Coordinator: No comments or questions at this time.

Gene Carpenter: Thank you. Fred.

Frederick Brown: So I want to thank everyone for coming and for the input and for the input to come, both for those that have said theirs - are sending letters and those that haven't said anything. I think a couple things - Doug, your comment on the portion of the agency that's corporate, I will offer that we're - that something we've been looking at closely.

I've actually watched the numbers move around in the budget in ways that weren't actually tied very well to the nature of the work. I think they made that look worse, but notwithstanding that it's high on the Commission's priority list. And for those that have looked at the - all of the Project Aim 2020 tasks, there was a specific task in looking at overhead and redefining that in a way that lines up more consistently with general government practice, and reducing it where it's unnecessary.

So I - well I think that your comment's well-taken, it's something we're working on and as you - the regulated community - and this was a comment from somebody on the phone - as you look at your interactions with the agency, you actually interact with us -- our corporate world -- in many ways. You do it in - when you deal with atoms, you do it with electronic doc submittal, you do it with electronic RAI processes, you do it with respect to the fee rule.

And there's lots of comment, obviously, and that's another area that we're specifically looking. But I - I'm struggling to make a point, so I'll try to make it clearly. You have an opportunity now to comment.

And while you can't see behind the curtain, you can comment on the impact that you see and you can comment to the extent that you have knowledge about all of our activities - and that includes corporate as well as regulatory. So we can't share our budget structure with you, but please don't feel inhibited from the lack of the budget structure to comment on the things that you observe that don't appear to be efficient and don't appear to be helping. You should make that comment, so please make it. And, you know, I - and the space, as you come into this building and the security for the building and all of those things go into our corporate expenses.

One other final thing kind of open from the discussion of the 200 products, that's actually the full - that's the full range of all of our activities in the agency are divided into about 200 products. That's not just the corporate or overhead or support functions. But, again, wanted to thank you, wanted to thank you for the comments.

One of the beauty of many of the comments we received today is that they were very specific, whether it was a specific rule or a rulemaking common prioritization process. There's enough detail there for us to be able to take that back and look at how we prioritize the task and the activity both. And so, for your comments in the future, if you could also make them very specific.

And interestingly, that's actually what we're offering to the staff as good examples is where a suggestion about internal process is specific enough that we can take action. Hypothetically, if one of our staff had said we shouldn't

have changed assignment of a (lar once a review's done - started because it's inefficient to pick up, that level of specificity would be something that we'd consider a good example.

Trish Gallalee: You gave some really good examples. I'm a business process improvement person, so I appreciate, you know, when you can give us just something specific like that. That will feed into maybe not something today, but down the road would be helpful to us, definitely.

Frederick Brown: Yes, so again, we are focused on the near term and the real, and we're also looking at long-term as Trish said. So even if we don't have the answer for a revised process now, it'll go into that work list. So again, I want to thank everyone, thank our participants on the phone and those in the room and the staff that had a chance to hear first-hand the input today. Gene are...

Gene Carpenter: As Fred said, thank you all on the telephone. If you do want to make comments, again, there are two means that you have. You can either mail through the U.S. Postal Service or otherwise.

You can also e-mail to us. So please make use of those. We do appreciate and value your input on this. Thank you to the people in the room. Fred, do you want to close for this meeting?

Frederick Brown: And the meeting is closed. Thank you very much.

Coordinator: Thank you for joining today's conference. That does conclude the call at this time. All participants may disconnect.

END