

EXECUTIVE SUMMARY OF EVALUATED AREAS FOR CENTERS OF EXPERTISE

This document provides an executive summary of the assessment of a number of technical and programmatic areas for centers of expertise (COEs). The specific areas include:

1. Decommissioning
- 2a. Security for research and test reactors
- 2b. Security for radiation sources
3. External hazards evaluations (e.g., seismic, flooding, meteorology)
4. Environmental reviews
5. Rulemaking
6. Operating experience and generic communications
7. Criticality safety evaluations
8. Advanced reactor technology
9. Technical specifications
10. Human factors
11. Allegations

Area 1: Decommissioning

Recommendation

The working group (WG) does not recommend further consolidation of agency decommissioning functions. The current program is effective, and there would be minimal efficiencies gained to offset the costs of forming a COE. In addition, consolidation at this time would potentially disrupt the integrated rulemaking for power reactor decommissioning that is currently underway. This rulemaking will streamline the transition from operations to decommissioning and will result in efficiencies in the decommissioning process.

The WG notes that consolidation of the Regional materials programs is being considered as a separate part of the Commission direction on Project AIM. As part of that tasking, the staff plans to evaluate the potential efficiencies that could be achieved through centralizing a variety of functions that may include inspection activities supporting materials decommissioning.

Area 2a: Research and Test Reactor (RTR) Security

Recommendation

The WG does not recommend reconsolidating RTR security into the Office of Nuclear Security and Incident Response (NSIR). While there is value in consolidating all security staff into NSIR, there would be minimal efficiencies gained to off-set the disruption to the RTR community and the Molybdenum-99 construction permit currently under review. RTR security is currently well integrated into the Office of Nuclear Reactor Regulation's (NRR's) RTR organization, and some efficiencies in dealing with the RTR community may be compromised by separating RTR security from its current organization.

Area 2b: Radiation Source Security

Recommendation

The WG does not recommend consolidating radiation source security into NSIR. While there is value in consolidating all security staff into NSIR, there would also be a loss of efficiency with respect to interaction with the various Agreement State programs as a result of removing the radiation source management program from the Office of Nuclear Material Safety and Safeguards (NMSS). The radiation source management program is currently well integrated into NMSS's infrastructure. If needed, NMSS has access to the security technical experts in NSIR.

Area 3: External Hazards Evaluations (e.g., seismic, flooding, meteorology)

Recommendation

The WG recommends pursuing a limited scope COE between NRR and the Office of New Reactors (NRO) to centralize natural external hazards reviews within NRO in support of both the new and operating reactors business lines. Centralization of reactor functions in this area will assist with an eventual NRR/NRO merger and will assist with normalization of workload in the reactor area as the workload decreases in the next several years. The WG does not recommend a COE that includes the materials programs in this area. Such consolidation would disrupt mission critical work in the materials programs and would not result in efficiencies due to the significant and necessary differences in standards, regulations, and approaches between the reactors and materials programs.

Area 4: Environmental Reviews

Recommendation

The WG does not recommend the creation of a COE for environmental reviews at this time because it would disrupt near-term, mission critical work (e.g., hearings, license renewal, licensing reviews).

The WG has determined that enhancements in efficiency and effectiveness could be achieved through consolidation of all the environmental review staff into one organization; however, separating environmental review from the licensing projects they support may negatively impact the efficiency and effectiveness of licensing actions.

The WG notes that the agency is considering a merger between NRR and NRO. If a merger is approved and implemented, it is expected that the merger plan will review the potential for consolidating staff performing environmental reviews for the reactor programs. The WG recommends that the National Environmental Protection Act steering committee continue to assess the appropriate timing for any COE as the workload in this area changes.

Area 5: Rulemaking

Recommendation

The WG recommends creating a COE in the area of rulemaking, for the rulemaking staff (i.e., project managers, regulatory analysis staff), and recommends that the COE be established in NMSS. Technical support for rulemakings would continue to be the responsibility of technical staff in each of the program offices. In selecting the home office for the COE (i.e., NMSS), the WG evaluated pros and cons. The WG determined that it is preferable for the office to be a program office, and not a supporting office such as the Office of Administration (ADM). NMSS

is recommended because: 1) NMSS currently has a large rulemaking program; 2) NMSS staff is experienced in forming and leading interoffice working groups and working with a diverse set of public stakeholders as well as supporting multiple business lines; and 3) NMSS will not be impacted by any potential merger of NRR and NRO. This recommendation does not extend to rulemaking activities conducted by offices reporting to the Commission, including the Office of International Programs and the Office of the Chief Financial Officer.

Area 6: Operating Experience and Generic Communications

Recommendation

NRR and NRO implemented a limited scope COE for reactor operating experience for both reactors in operation and those under construction. The staff will continue to consider opportunities to improve the efficiency of this COE, including the potential for minor changes in staffing levels (i.e., reductions in staffing to capture gains from future process improvements). Due to the differences in the existing operating experience programs, it is not clear that consolidating the reactor and materials programs in this area would lead to enhanced effectiveness or efficiency. Thus, consolidation of this area is not recommended at this time.

The Generic Communications Program is currently centralized within NRR with an office coordinator in NRO, NMSS, NSIR, and ADM. No additional consolidation is recommended.

Area 7: Criticality Safety Reviews

Recommendation

The WG does not recommend the creation of a COE related to criticality safety reviews at this time. While some efficiencies could be gained by more closely aligning approaches to criticality safety reviews across the agency, the creation of a COE would disrupt mission critical work and would not result in efficiencies due to the significant and necessary differences in standards, regulations, and approaches between the reactors and materials programs.

The WG notes that the agency is considering a merger between NRR and NRO. If a merger is approved and implemented, it is expected that the merger plan will review the potential for consolidating staff performing criticality safety reviews for the reactor programs.

Area 8: Advanced Reactors

All of the Agency's resources for advanced reactors, defined in this report as non-light water power reactors (vice the small light-water modular reactors) are currently centralized within NRO. NRO has the lead for managing the development and resolution of policy issues for all activities involving the licensing of non-light water power reactor designs, such as engaging with reactor vendors, interacting with the Department of Energy (DOE) and international groups, considering approaches for the licensing reviews, and developing Commission papers on policy issues. NRO leverages the work of the DOE in this area. Technical staff from all of the program offices engage in various non-light water reactor activities at a minimal resource level to stay informed of the Department of Energy activities (e.g., attending technical seminars). If this becomes a growth area for the agency, the current organizational structure will be reassessed. Because it already exists as a COE, the WG did not conduct further evaluations of this focus area.

Area 9: Technical Specifications

Recommendation

The WG recommends that NRR and NRO centralize technical specifications reviews within NRR in support of both the new and operating reactors business lines. The WG does not recommend a COE that includes the materials programs in this area. Such consolidation would disrupt mission critical work in the materials programs and would not result in efficiencies due to the significant and necessary differences in standards, regulations, and approaches between the reactor and materials programs.

Area 10: Human Factors

Recommendation

The WG does not recommend the creation of a COE related to human factors because it would disrupt mission critical work and would not result in efficiencies based on the high degree of differences in the types of work performed by each organization.

The WG notes that the agency is considering a merger between NRR and NRO. If a merger is approved and implemented, it is expected that the merger plan will review the potential for consolidating staff performing human factor licensing reviews for the reactor programs.

Area 11: Allegations

Recommendation

The WG recommends consolidating Headquarters' Office Allegation Coordinator (OAC) functions in the Office of Enforcement and maintaining Regional OAC roles as they currently exist. Technical review of allegations would remain the responsibility of the appropriate region or program office. This consolidation offers potential resource savings and enhances agility and efficiency across all business lines with minimal risk of negative side effects.