Retrospective Review of NRC's Administrative Requirements

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Overview

- Development of industry input
- Industry priority – 50.72 PRM
- Recommendations

Industry Review ~ 300 items

		One		Two		Three		Four		Five		Six NRC		7 NEI		Category
§ 11.16	Immediately by telephone; with prompt written confirmation															
§ 19.13(a),(b)	Annually															
§ 19.13(c)	Within 30 days of request or determination of exposure, whichever is later					A										
§ 19.13(d)	Concurrent with submittal of report to the NRC					C										
§ 19.13(e)	Upon request of employee or employee designee (30 days thereafter)					A										

Results

Sub categories created under each NRC criterion.

- Criterion 1, "Not Used" – 6 subcategories
- Criterion 2, "Alternative" – 12 subcategories
- Criterion 3, "Less Frequent" – 4 subcategories
- Criterion 4, "Burden" – 4 subcategories

Subcategories were consolidated into ~ ten items. NEI will address these in responding to the FRN questions

- Criterion 6 – Other criteria we wanted to flag for NRC. One example is candidates for direct final rules.
- Criterion 7 – Items that NEI took for action. Examples include effluent reporting templates.

Industry Priority - 50.72 PRM

- Petition for rulemaking submitted August 2, 2018
- Requested NRC amend 10 CFR 50.72 to eliminate non-emergency reporting requirements
- These reports are outdated and add burden without benefit to public health and safety, in our view
- Docketed by NRC as PRM-50-116 and published for public comment in November 2018 (83 FR 58509)
- Public comment period closed on February 4, 2019 following the receipt of 16 public comments
- No visible progress since that time

Industry Priority - 50.72 PRM (con't)

Residents receive pre-notification prior to 50.72 reporting.

- Criterion 1, "Not Used" – Trends and OE built on 50.73 reports. "Pre-Calls" cover communication to region. Reactive inspections can be performed without 50.72 reports.

- Criterion 2, "Alternative" – "Pre-calls" cover communications. LER provides more details.

- Criterion 3, "Less Frequent" – LER satisfies agency's needs.

- Criterion 4, "Burden" – Two engineers / Two operators / Two Licensing over eight hours. Large distraction at time of discovery.

Recommendations

- We appreciate the opportunity to provide our input
- We urge the NRC to act on our 50.72 petition (PRM-50-116) expeditiously
- We urge the NRC to act promptly on the next phase of the RROAR