




UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

January 17, 1983

MEMORANDUM FOR: William J. Dircks,
Executive Director for Operations

FROM: James R. Tourtellotte, Chairman 
Regulatory Reform Task Force

SUBJECT: BACKFITTING IMPACT COSTS

Enclosed is an analysis outlining the actual costs of backfitting at a number of nuclear power plants. To my knowledge, this is the first example of a detailed analysis of actual backfitting costs and the specific projects which accounted for them.

To help the Regulatory Reform Task Force and the Commission understand this information, I would like the staff to answer the following questions:

1. Did the NRC conduct cost analyses for these actions? What were the results? How did they compare to actual costs? If cost analyses were not conducted, why not?
2. Please identify those projects listed in the enclosure which were required by regulation or rule, those required by order, and those required by other means. Identify the specific means for those in the last category.
3. Of those items identified in the enclosure as ongoing or future backfitting projects:
 - a) Which are subject to CRGR review?
 - b) If any are not subject to CRGR review, why not?
 - c) For these items, has there been any ^{substantive} ~~substitute~~ analysis of costs and benefits?
 - d) If so, what was done and by whom?
4. Why was each project listed in the enclosure (other than those required by rule) the subject of backfitting? For example, did new information become available questioning the adequacy of existing design or did the staff discover a previously unreviewed situation it considered unacceptable?

5. Provide the dates that each of the projects listed in the enclosure were required of these licensees? To what extent were these items also required of other operating plants or plants under construction?

6. If possible, categorize the projects listed in the enclosure in terms of safety value or significance? Are they all considered equally significant? If not, prioritize into most significant, significant and least significant.

7. Provide any comments the staff may have regarding the accuracy or characterization of the enclosed information. In particular, does the staff agree with the statements on pages seven (re: Catawba) and nine (re: Byron) asserting that 40% of the total costs of these NTOL's is due to regulatory impact? If not, why not? What evidence can the staff present refuting these claims?

Please provide a response by February 1, 1983.

Enclosure:
Nuclear Power Plant Backfitting
and Regulatory Impact Costs

cc:
Chairman Palladino
Commissioner Gilinsky
Commissioner Ahearne
Commissioner Roberts
Commissioner Asselstine
OPE
OGC
SECY

cc w/encl.:
OCA
RRTF Members
ACRS