

# **B&W Owners Group Opinions on Alternative ECCS Options**

## **BURDEN REDUCTION**

**A Prime Goal Risk Informed Regulation**

**If Burden Is Defined As Effort To Comply**

**The Alternatives:**

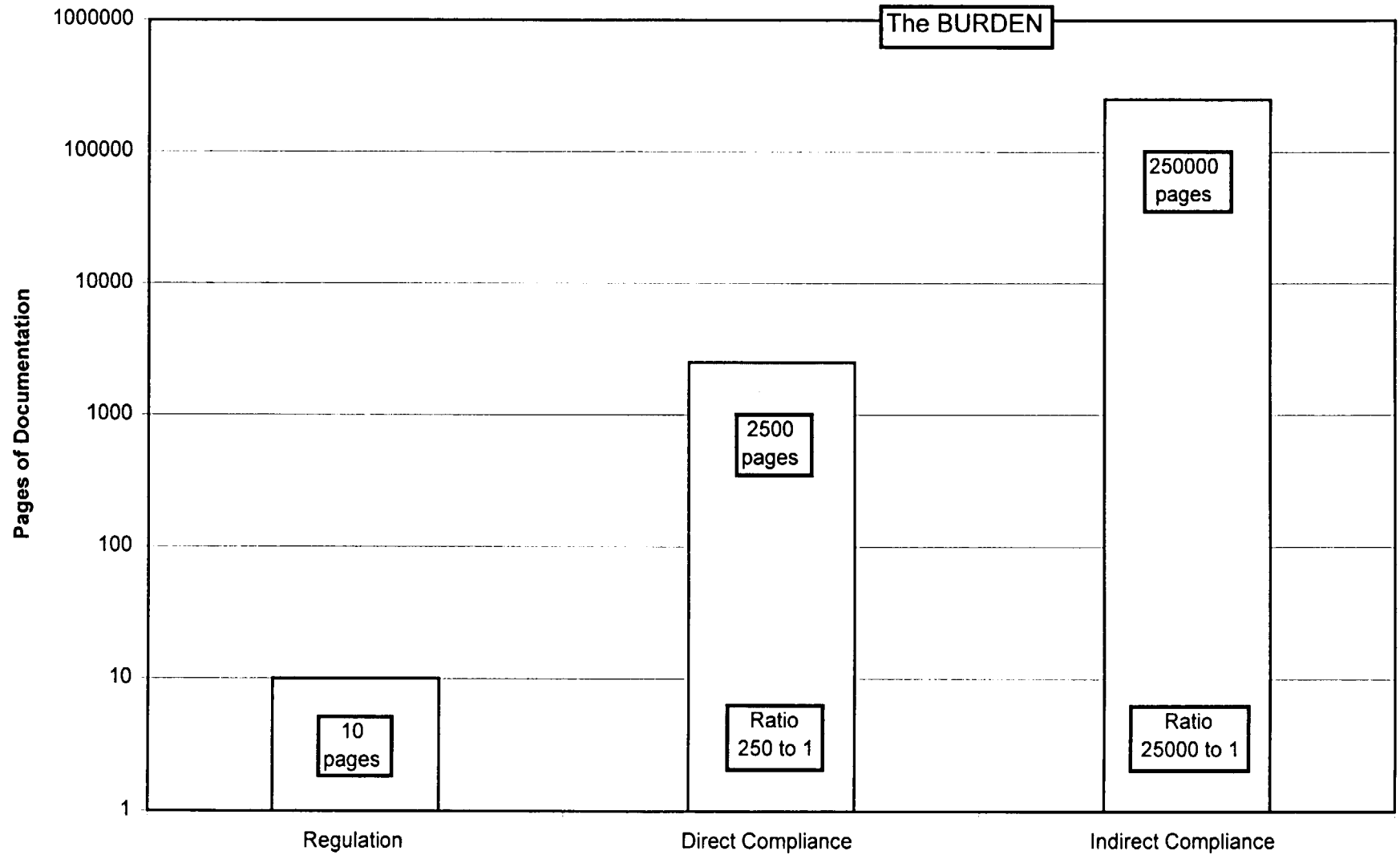
**Offer Little Opportunity For Reduced Burden**

**Only “Alteration of Reporting” Would Reduce  
Burden**

**The Others Are At Best NEUTRAL On BURDEN or**

**Would Actually INCREASE BURDEN**

## DOCUMENTATION BURDEN OF LBLOCA



# **SO LONG AS THE DOMAIN REMAINS**

**A Learning Curve Will Remain In Place and  
Regulation Will Continue To Expand**

**REMOVAL OF THE DOMAIN IS THE ONLY  
WAY TO ASSURE SIGNIFICANT BURDEN  
REDUCTION**

**THUS THE PRIMARY FOCUS SHOULD BE  
ON THE REDEFINITION OF THE MAXIMUM  
SIZE LOCA AND ITS IMPACT ON  
CONFORMING REGULATIONS**

**The Alternatives Should Be Considered Only If Break  
Size Reduction Becomes Non-Viable**