

CER / RPI

Cumulative Effects of Regulation / Risk Prioritization Initiative

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The CER/RPI challenge can be summed by:

**Proper allocation of
resources improves safety**

Everyone Agrees: Safety-Focus the Resources

- **UCS, March 14, 2015, letter:**

“...neither the nuclear industry nor [NRC] has the luxury of excessive resources. Consequently, resources allocated to nonproductive and low priority matters dilute... and distract... misallocation of limited resources can undermine nuclear safety.”

- **NRC policy:**

- The NRC should “focus agency resources on activities most important to safety and security.” *NRC Strategic Plan*

- The NRC’s “[r]egulatory activities should be consistent with the degree of risk reduction they achieve.” *Principles of Good Regulation*

- **SNC agrees. Proper allocation of resources improves safety.**

Pilot Programs

- **Pilots were completed at six different sites across the country**
- **Southern successfully piloted RPI at Hatch**
- **Ranked 20 different projects based on NEI draft guidance**
- **Only a handful of activities (three) were considered for deferral**
- **NRC observed the process**

Pilot Programs, cont.

- **Example of low ranking: Degraded Grid Transformers**
 - **Low ranking: NEI Priority 4**
 - **Very Low Safety Importance**
 - **Very large commitment of resources: people, equipment, design. (large project team required)**
 - **Approximately \$40 million is required to address this issue**
 - **Hatch anticipates submitting commitment change**

Emergency Preparedness / Security

- **The NEI guidance is robust and requires evaluations of EP and Security**
- **Hatch pilot provides an example of this process working**
 - **Cyber Security implementation, 10 CFR 73.54**
 - **Analyzing this activity resulted in a “medium” for the Cyber Security portion of the analysis**
 - **This resulted in this activity being ranked among the highest priorities**

Emergency Preparedness / Security, cont.

- **The Hatch Cyber Security example gives confidence in the NEI guidance in ensuring that Security impacts are given proper consideration.**
- **EP impacts would work in the same way.**

Deferred Activities

- **NEI guidance provides the basis for deferred scheduling of activities having low safety significance.**
- **“Backstops” for deferred activities having little or no safety significance already exist.**

Summary

- **In the current climate, both NRC and industry are compelled to effectively allocate resources.**
- **Everyone is in agreement with the goal: focus resources on safety significant activities.**