

July 18, 2014

MEMORANDUM TO: Mark A. Satorius  
Executive Director for Operations

FROM: Annette L. Vietti-Cook, Secretary **/RA/**

SUBJECT: STAFF REQUIREMENTS – COMSECY-14-0014 – CUMULATIVE  
EFFECTS OF REGULATION AND RISK PRIORITIZATION  
INITIATIVE: UPDATE ON RECENT ACTIVITIES AND  
RECOMMENDATIONS FOR PATH FORWARD

The Commission has approved the staff's plan to merge the deliverables associated with the Cumulative Effects of Regulation (CER) and the staff's response to Staff Requirement Memorandum (SRM) COMGEA-12-0001/COMWDM-12-0002, "Proposed Initiative to Improve Nuclear Safety and Regulatory Efficiency," commonly known as the Risk Prioritization Initiative (RPI). The staff should provide the Commission with a notation vote paper on March 31, 2015, that responds to both taskings, subject to the comments below.

The notation vote paper should include consideration of the regulatory process changes required to support reliable, efficient, and effective implementation of the RPI in the long term (e.g., modification of the language of 10 CFR Part 50.12 to obviate the need for exemptions, provided that the risk prioritization is based on an appropriate PRA).

The paper should provide a discussion on how corrective actions for findings, violations, and degraded or nonconforming conditions adverse to quality will be treated as part of the risk prioritization initiative.

The staff should brief the full ACRS prior to sending the paper to the Commission.

The staff should provide a Commissioner Assistant's note covering relevant issues related to CER and RPI before mid-August 2014 and should be prepared to provide individual Commissioner briefings during the same time frame.

cc: Chairman Macfarlane  
Commissioner Svinicki  
Commissioner Magwood  
Commissioner Ostendorff  
OGC  
CFO  
OCA  
OPA  
Office Directors, Regions, ACRS, ASLBP (via E-Mail)  
PDR