NRDC Comments on: SECY-18-0060
"ACHIEVING MODERN RISK-INFORMED REGULATION"

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NRDC Comments on:

- “The Need for Cultural Transformation at the NRC”
- Recommended Transformation Initiative
  “Strategy to Transform the Agency Licensing Review Process”
- Recommended Transformation Initiative
  “10 CFR 50.59 and Similar Change Processes”
- Advanced Reactors
- Digital Instrumentation and Controls

NRDC

October 29, 2018

NRDC Comments on SECY-18-0060 Recommendation 1

"Transform the agency licensing review process by development of an agencywide process and organizational tools to expand the systematic use of qualitative and quantitative risk and safety insights; thereby, enabling staff to scale the scope of review and level of detail needed to make a finding of reasonable assurance of adequate protection, beginning with the licensing reviews for reactors"

October 29, 2018

NRDC Comments on SECY-18-0060 Recommendation 2

"Revise 10 CFR 50.59 and other similar requirements to allow additional flexibility for licensees to make facility changes without prior NRC approval"

October 29, 2018

NRDC Comments on SECY-18-0060 Recommendation 3

"Initiate an optional performance-based, technology-inclusive regulation for non-LWRs"

October 29, 2018

NRDC Comments on SECY-18-0060 Recommendation 4

"Initiate rulemaking to define high-level performance-based I&C safety design principles and develop associated regulatory guidance that documents the acceptable standards that may be used to meet these principles"

October 29, 2018