

Cumulative Effects of Regulation

Presenter: Matt Bartlett

NRC Project Manager NMSS/FCSE

301-287-9112, matthew.bartlett@nrc.gov

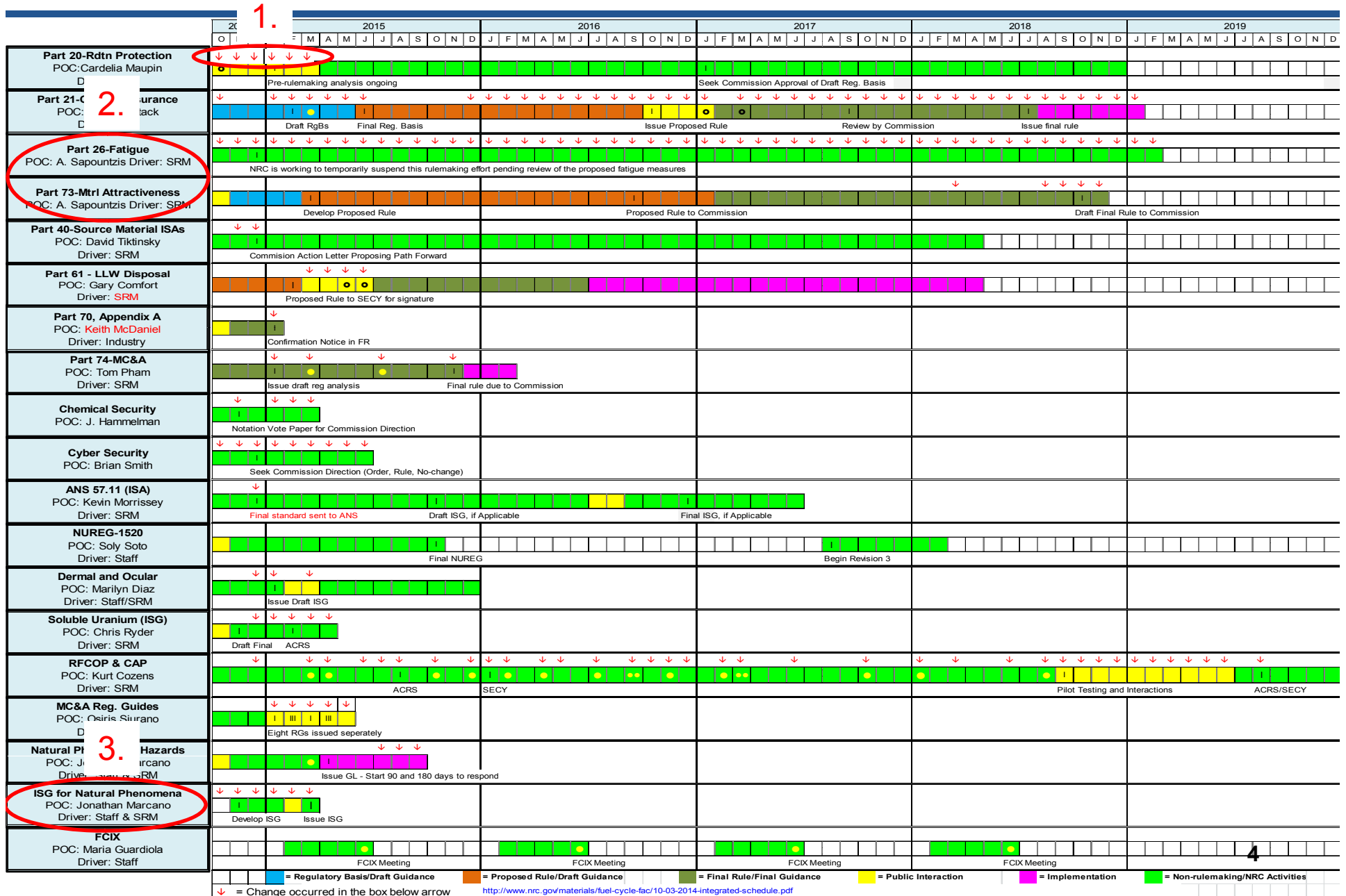
Introduction

- **CATEGORY 2 MEETING**
 - The primary discussions are expected to be between the NRC, the Nuclear Energy Institute and industry representatives. Members of the public will be invited to participate at designated points during the meeting.
- **REMINDER**
 - The timelines presented are based on best estimates, but may change based on pressing safety issues or other Commission priorities.

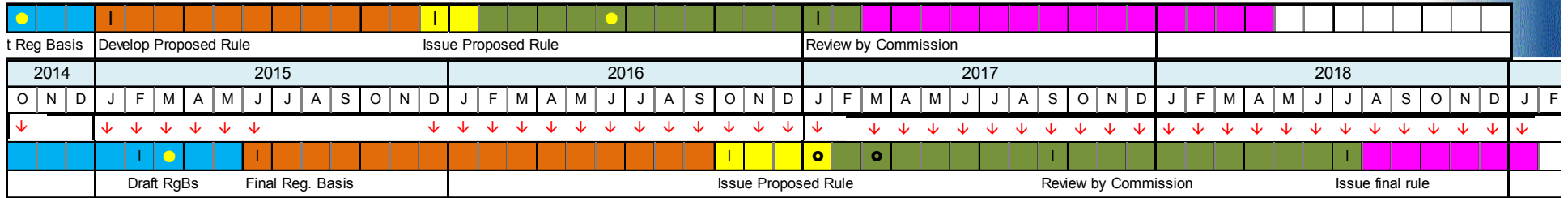
CER Agenda

- **Updates to the Integrated Schedule**
- **Discussion of Items on Integrated Schedule**
- **Status of the Regulatory Issue Resolution Protocol (RIRP)**
- **Next Quarterly CER Meeting**

Integrated Schedule



Top 11-3-14, Bottom 12-4-14



Key Information on Part 21, Quality Assurance:

- Release Revision 1 to the Draft Regulatory Basis in February 2015
- Staff to issue final Regulatory Basis in June 2015 and begin work on proposed rule and regulatory guides
- Finalize proposed rule October 2016
- Expect to finish rulemaking in 2018

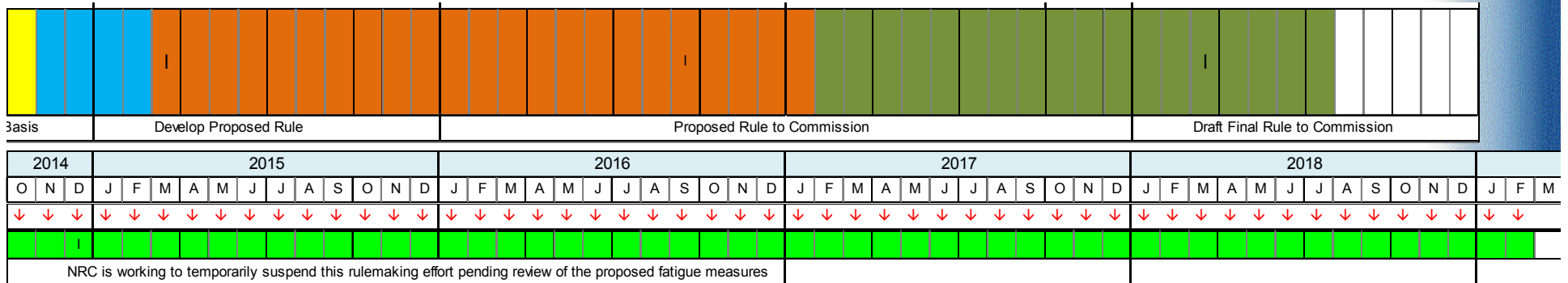
Meeting Information:

- March 2015 – Public meeting to discuss comments on revision 1 of the regulatory basis
- October 2016 – January 2017, 75 day comment period on the draft proposed rule
- January 2017 – Meeting to discuss comments on the proposed rule
- March 2017 – Meeting to discuss resolution of comments on the proposed rule

Contact:
 Sabrina Atack
[NMSS/FCSS/PORSB](#)
 301-287-9075



Top 11-3-14, Bottom 12-4-14



Key Information on Part 26, Subpart I, Managing Fatigue:

- Parts 26 and 73 will be performed in parallel because they have similar stakeholders and both rules are security related.
- Staff is reviewing the proposed alternative fatigue measures provided by the Category I licensees for security officers during the comment period of the draft regulatory basis. Staff will remove the Part 26 basis from the final Part 73 regulatory basis. As a result, staff is working with NRC management to temporarily suspend this rulemaking effort pending review of the proposed fatigue measures.

Meeting Information:

- None Scheduled

Contact: Alex Sapountzis,
[NSIR/DSP/FCTSB](#),
 301-287-3660



Top 11-3-14, Bottom 12-4-14

Issue Direct Final rule for comment	
2014	2015
O N D	J F M A M J J A S O N D
	<div style="text-align: center; color: red;">↓</div>
	Confirmation Notice in FR

Key Information on Part 70 Appendix A, Reportable Safety Events:

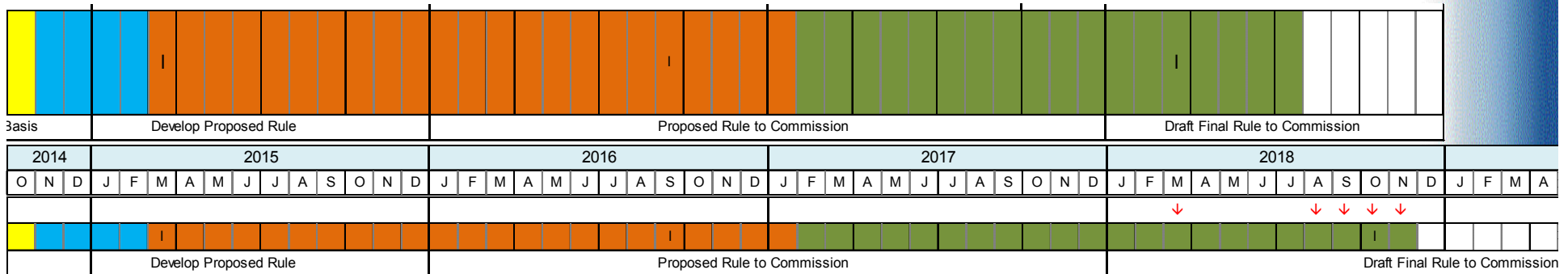
- Rulemaking to revise the number of days that would be allowed for a licensee to submit the written follow-up report after discovery of the event, to update the reporting framework for certain situations and to remove redundant reporting requirements.
- The direct final rule was published in the *Federal Register* on Friday, September 26, 2014 with a 30 day comment period and an effective date of January 26.
- This is a direct final rulemaking.
- The direct final rulemaking is waiting final OMB clearance expected in December 2014. Once this clearance is received, the NRC will publish a notice in the Federal Register to confirm the January 26 effective date.

Meeting Information:

- None scheduled.



Top 11-3-14, Bottom 12-4-14



Key Information on Part 73, Material Attractiveness:

- Improve consistency and clarity.
- Make generically applicable security requirements similar to those imposed by security orders issued following the terrorist attacks of September 11, 2001.
- Consider risk insights, operational oversight, inspection activities, and international guidance (e.g., Material Attractiveness, Dose Limit Threshold, Sabotage, Safety-safeguards Interface).
- Use a risk-informed and performance-based structure.
- The Regulatory Basis is expected to be developed by March 2015.
- Commissioner Assistant Note to Commission March 2015.
- Proposed rule to the Commission on September 2016.
- Draft regulatory guide to Commission by January 2017, however with the goal to complete the draft regulatory guides by September 2016.
- Final rule to the Commission by March 2018.
- Final regulatory guide to the Commission by October 2018, however with the goal to complete the final regulatory guides by March 2018.
- Public comments on the draft regulatory basis via FRN closed on October 17, 2014. Staff is reviewing comments for informing the draft regulatory basis.

Meeting Information:

- None Scheduled



Top 11-3-14, Bottom 12-4-14

Discuss meaning of previous comments																											
2014				2015								2016															
O	N	D		J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
Issue draft reg analysis																											
Final rule due to Commission																											

Key Information on Part 74, Material Control and Accounting of SNM:

- The comment period on draft rule and guidance was extended and now ends on March 10, 2014.
- The schedule has been rebase-lined to extend the completion date by one year to allow resolution of comments.
- The NRC plans to issue the revised regulatory analysis for the draft rule (no comment)

Meeting Information:

- January and February 2015 – Opportunity to provide comment on the draft non-fuel cycle guidance for Part 74
- February or March 2015 - Meeting to discuss the regulatory analysis and comments on the proposed rule.
- July – August 2015 – Meeting to discuss the implementation schedule for the rule

Contact:
Tom Pham,
[NMSS/FCSS/MC&AB](#),
301-287-9132



Top 11-3-14, Bottom 12-4-14

[Green]				[Green]				[Green]				[Green]				I															
																Notation Vote Paper for Commission Direction															
2014								2015																							
O	N	D						J	F	M	A	M	J	J	A	S	O	N	D												
																Notation Vote Paper for Commission Direction															

Key Information on Chemical Security:

- NSIR completed visits to fuel cycle facilities and found that there is adequate protection of chemicals of interest.
- NSIR has communicated this to the Commissioners’ Technical Assistants and to industry.
- NSIR held a workshop with the licensees to discuss the results of the site visits and methods for licensees to provide updated information on chemical inventory, location and security measures.
- NSIR provided the Commission with a notation vote paper that describes the staff’s evaluation of existing chemical security practices and options for monitoring any changes in these practices, (response expected in spring 2015).

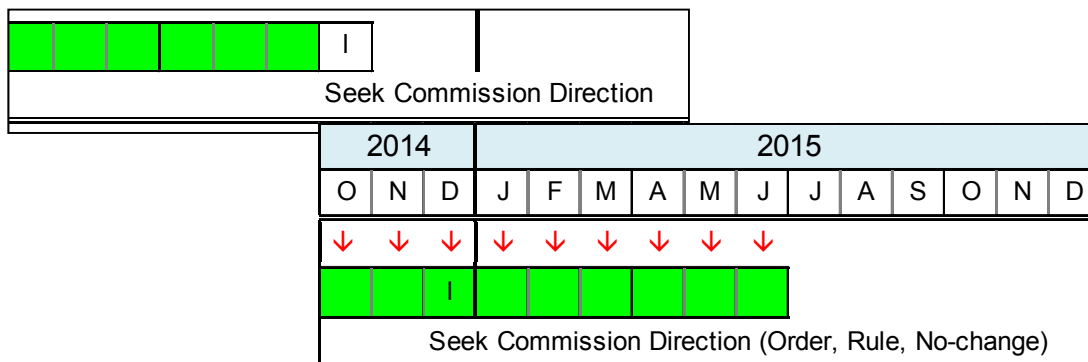
Meeting Information:

- None Scheduled

Contact: Jim Hammelman, [NMSS/FCSS/FMB](#), 301-287-9108



Top 11-3-14, Bottom 12-4-14



Key Information on Cyber Security:

- Directed by management as part of process to evaluate this need for all types of non-power reactor licensees.
- Evaluating the need for establishing requirements for cyber security at fuel cycle facilities.
- The NRC staff will seek Commission direction.

Meeting Information:

- None Scheduled

Contact:

Brian Smith,
[NMSS/FCSS/EUB](#),
 301-287-9088



Top 11-3-14, Bottom 12-4-14

Final ANS Standard												Draft ISG, if Applicable												Final ISG, if Applicable											
2014			2015												2016												2017								
O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S
↓																																			
Final standard sent to ANS												Draft ISG, if Applicable												Final ISG, if Applicable											

Key Information on ANS 57.11, ISA Standard:

- Development of the standard could take up to 3 years to be finalized.
- The schedule has not been confirmed with ANS so the date for a public comment period has not been established.
- Depending on the content of the ANS standard, the NRC staff may determine that an ISG on certain aspects of performing an ISA is necessary. If this occurs, the ISG is projected to be developed in late 2015 or 2016.

Meeting Information:

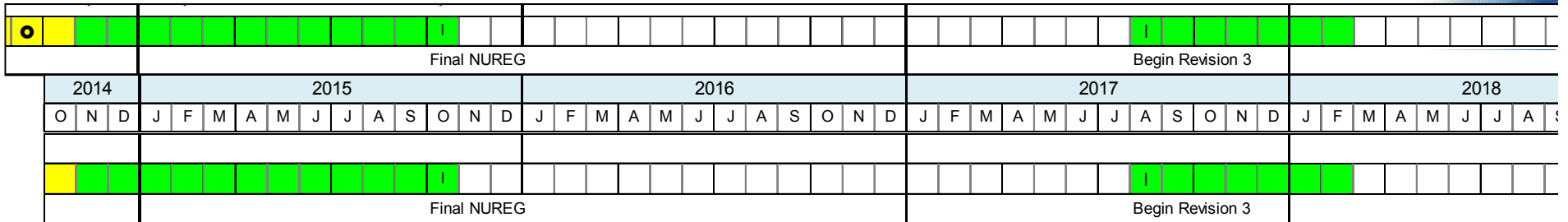
- The ANS typically does not put draft standards out for public comment.
- If needed, a public comment period will be provided following development of a draft ISG.

Contact:

Kevin Morrissey,
[NMSS/FCSS/CDMOB](#),
 301-287-9080



Top 11-3-14, Bottom 12-4-14



Key Information on NUREG-1520, Revision 2:

- NUREG-1520 is being revised and we anticipate that another revision will be needed after the ANS standard is issued.
- The revision will not address ISA-related issues.
- A 150 day public comment period on the draft NUREG began in June 2014 and ran till November 3, 2014.

Meeting Information:

- None scheduled

Contact:

Soly Soto,
[NMSS/FCSS/FMB](#),
 301-287-9076



Top 11-3-14, Bottom 12-4-14

↓ ↓	↓ ↓																																		
Issue Draft ISG																																			
2014			2015												2016																				
O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D									
↓ ↓												↓ ↓ ↓																							
Issue Draft ISG																																			

Acute Chemical Exposures (Dermal and Ocular)

- NRC is working to create an Interim Staff Guidance (ISG) document on acute chemical exposures including all exposure pathways.
- The ISG will discuss the criteria staff will apply when reviewing the ISA chemical safety analysis and proposed quantitative standards used to demonstrate compliance with 10 CFR 70.61 and 70.65(b)(7).
- NRC has conducted a backfit evaluation and determined that if the NRC position is a backfit then it would be justified by the compliance exception.

Meeting Information:

- February - March 2015, 60 day comment period on the draft ISG for Dermal and Ocular

Contact:
Marilyn Diaz,
[NMSS/FCSE/FMB](#),
301-287-9068



Top 11-3-14, Bottom 12-4-14

↓														
I	I													
Draft ISG		Final Guidance												
2014						2015								
O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
↓		↓		↓										
I	I	I	I	I										
Draft Final					ACRS									

Soluble Uranium:

- NRC is finalizing an Interim Staff Guidance (ISG) document on acute exposure to soluble uranium for compliance with 70.65(b)(7).
- The draft ISG on acute uranium exposure standards was published for public comment in the *Federal Register*, (FRN Vol. 79, September 17, 2014, pg. 55834).

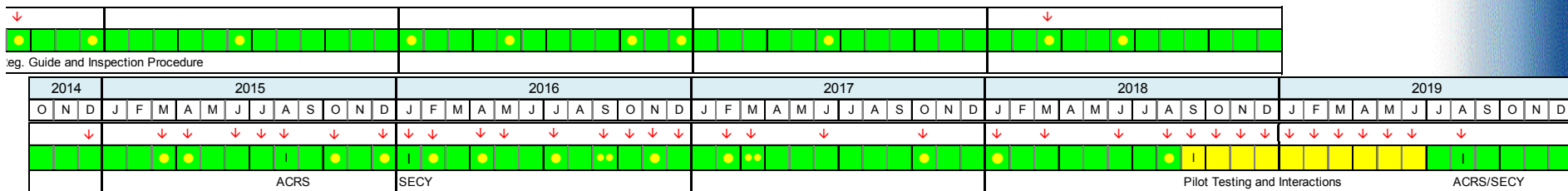
Meeting Information:

- None Scheduled

Contact:
Chris Ryder,
[NMSS/FCSS/FMB](#),
301-287-0651



Top 11-3-14, Bottom 12-4-14



Key Information on RFCOP and Corrective Action Program:

- Multiyear project; multiple public interactions, anticipate 3-4 outreach meetings per year.
- Staff completed Phase I of the RFCOP and Phase 2 began in July, 2014.
- Late-January or early February 2015, public release of the draft cornerstones and the basis document.

Meeting Information:

- Multiple meetings, see supplement

Contact:

Kurt Cozens,
[NMSS/FCSS/PORSB](#),
 301-287-9061



Top 11-3-14, Bottom 12-4-14

█	█	█	█	█	█										
2014				2015											
O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	
			↓	↓	↓	↓	↓								
█	█	█	█	█	█	█	█								
Eight RGs issued seperately															

Key Information on Material Control and Accounting Regulatory Guides:

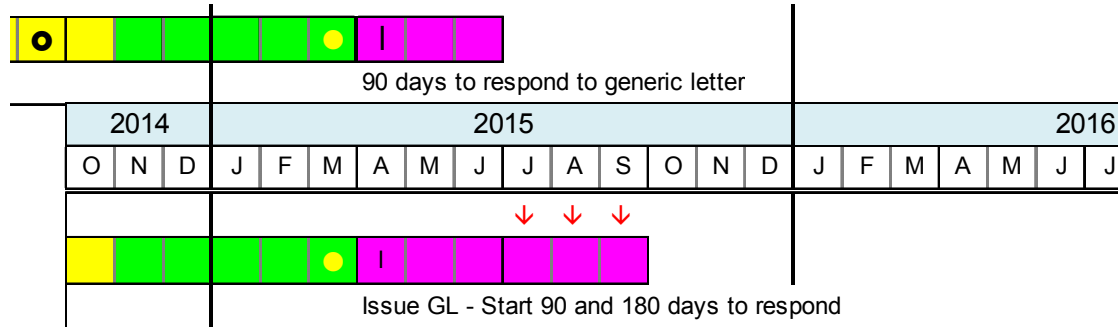
- The purpose of this effort is to consolidate and eliminate outdated guidance as requested by the Chairman.
- 27 MC&A guidance documents are consolidated into 8 documents.
- DG-5050 - Selection of Material Balance Areas and Item Control Areas. Out for public comment in early January 2015.
- DG 5049 - Management Review of Nuclear Material Control and Accounting Systems. Out for public comment 2/1/2015.
- DG-5051 - Shipping, Receiving, and Internal Transfer of Special Nuclear Material. Out for public comment 2/15/2015.
- DG-5056 - Material Control and Accounting Physical Inventories and Material Balances. Out for public comment 2/15/2015.
- DG-5055 - Statistical Concepts for Material Control and Accounting. Out for public comment 3/15/2015.
- DG-5052 - Determination of Uranium or Plutonium: Methods based on the Analysis of Samples. Out for public comment in April 2015.
- DG-5053 - Determination of Uranium or Plutonium: Nondestructive Assay Methods. Out for public comment in April 2015.
- DG-5054 - Design Considerations to Minimize Residual Holdup of Special Nuclear Material in Process Equipment. Out for public comment in April 2015.
- None of the integrated Regulatory Guides are impacted by ongoing draft rulemaking of 10 CFR 74.

Meeting Information:

- December 2015 – DG-5051, 60 day comment period.
- January 2015 – DG-5050, 60 day comment period.
- February 2015 – DG 5049, DG-5051, and DG-5056; 60 day comment period.
- March 2015 – DG-5055, 60 day comment period
- April 2015 – DG-5052, DG-5053, and DG-5054; 60 day comment period



Top 11-3-14, Bottom 12-4-14



Key Information on Natural Phenomena Hazards (Generic Letter):

- The Generic Letter will serve as the basis to close Unresolved Items (URIs) from post-Fukushima Temporary Instruction 2600/15 regarding the natural phenomena events accident sequence and how licensees are in compliance with regulatory requirements.
- A supporting Interim Staff Guidance document may be developed to facilitate issue resolution and generic letter responses.
- The NRC staff will publish a generic letter and receive licensee's response in 2015.

Meeting Information:

- March 2015, Hold a conference call with stakeholders to provide an overview of implementation requirements.

Contact:
Jonathan Marcano,
[NMSS/FCSS/PORSB](#),
301-287-9063



Top 11-3-14, Bottom 12-4-14

2014			2015											
O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
↓	↓	↓	↓	↓	↓									
	I	I	I	I	I									
Develop ISG					Issue ISG									

Key Information on ISG for Natural Phenomena

- Interim Staff Guidance (ISG) for natural phenomena hazards will be issued in the Federal Register for public comment. The ISG will be incorporated into future revisions of Appendix D of Chapter 3 of NUREG-1520.

Meeting Information:

- December 2014 – January 2015: Public meeting to discuss ISG during public comment period.

Contact:
Jonathan Marcano,
[NMSS/FCSS/PORSB](#),
301-287-9063



Top 11-3-14, Bottom 12-4-14

2014				2015					2016					2017					2018																																										
O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A																											
								●												●															●																●										
				FCIX Meeting					FCIX Meeting					FCIX Meeting					FCIX Meeting																																										

Key Information for RFCOP on Fuel Cycle Information Exchange:

- The annual FCIX is scheduled for June,, 2015 at the US Nuclear Regulatory Commission headquarters.

Meeting Information:

- June, 2015, Annual Fuel Cycle Information Exchange

Contact:
 Maria Guardiola,
[NMSS/FCSS/CDMOB](#),
 301-287-9118



Status of Regulatory Issue Resolution Protocol (RIRP)

Received: NEI 14-14, “Regulatory Issue Resolution Protocol” - ML14337A168

- **Endorsement Letter:** In concurrence
- **Estimated Completion:** December 2014
- **Test Case:** To be determined

Next Quarterly Meeting

- **Week of March 2**
- **Atlanta Buckhead**
- **NRC participating on NEI Fuel Cycle Oversight Committee**

Summary

- **Maintain Integrated Schedule and Supplement**
- **Finalize RIRP**
- **Next Quarterly Meeting in March 2015**