

June 20, 2003

MEMORANDUM TO: Charles E. Ader, Chairman
Committee to Review Generic Requirements

FROM: Samuel J. Collins, Director */RA/*
Office of Nuclear Reactor Regulation

SUBJECT: VALUE ADDED BY THE REVIEW OF THE COMMITTEE TO REVIEW
GENERIC REQUIREMENTS

In your memorandum dated May 29, 2003, you invited comments on the value that the Committee to Review Generic Requirements (CRGR) adds to our products. Specifically, you requested comments in four areas: (1) assessment of value added by CRGR review, (2) staff effort expended in addressing CRGR comments and recommendations, (3) impact on schedule, and (4) assessment of the significance of the issues and associated costs in terms of overall impact on schedules and resources.

Office of Nuclear Reactor Regulation staff that were responsible for products reviewed by the CRGR between June 2002 and May 2003, were asked to provide comments in these four areas. The comments are summarized below.

(1) Your assessment of the “value added” by the CRGR review (e.g., improvement in the quality of the product from the standpoint of underlying safety concerns and backfit considerations, completeness, and consistency with the Commission’s policies, rules, and regulations).

Overall, the staff found value in the input provided by the CRGR. In several instances, the CRGR provided insights that more clearly focused the staff’s product and improved its clarity. In another instance, the CRGR’s review identified a backfit in a rulemaking package.

(2) The staff efforts expended in addressing CRGR comments and recommendations, excluding the time required for OGC and program office concurrence.

The staff consistently responded that approximately 3-days effort was expended in addressing CRGR comments and recommendations. However, the staff did not specifically track this information.

(3) Impact on schedule, if any.

For the majority of NRR products that have undergone CRGR review, there was no impact on schedule. However, one staff member indicated that he had difficulty scheduling a meeting with the CRGR because a higher priority issue took precedent (i.e., Bulletin 2003-01).

(4) Your assessment of the significance of the issues and associated costs in terms of overall impact on schedules and resources.

There was no staff consensus in this area. Some replied that the benefits of the CRGR review justified the associated costs (i.e., schedule and resource impacts). Others indicated that there was minimal or no impact on schedule and resources. And, some staff indicated that the costs outweighed the benefits of the review.

Staff also provided general comments on their interactions with the CRGR including stating frustration with having to spend a considerable amount of time retracing steps and redeveloping the logic of previous decisions when the regular CRGR members were replaced with substitutes.

There is no doubt that the CRGR's review and comments are helpful and improve the quality of our products. However, the true cost of a review should not only include staff efforts expended in addressing the CRGR's comments, but also the effort used in preparing the presentation.

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