

September 9, 2003

MEMORANDUM TO: Chairman Diaz
Commissioner McGaffigan
Commissioner Merrifield

FROM: William D. Travers */RA/*
Executive Director for Operations

SUBJECT: PERIODIC ASSESSMENT OF THE ACTIVITIES OF THE
COMMITTEE TO REVIEW GENERIC REQUIREMENTS

The purpose of this report is to inform the Commission of the staff's assessment of value added to various proposed generic actions presented during this assessment period for CRGR review and endorsement. This assessment is based on both program office input and the CRGR's self assessment of its activities and contributions to the agency's mission.

This report contains an evaluation of the Committee to Review Generic Requirements' (CRGR) activities from June 1, 2002, through May 31, 2003, in response to the Staff Requirements Memorandum (SRM), "SECY-97-052 - Committee to Review Generic Requirements (CRGR) - Scope of Review and Periodic Review Activities," dated April 18, 1997.

The CRGR reports to the Executive Director for Operations (EDO) and consists of a chairman appointed by me and senior managers from the Offices of General Counsel (OGC), Nuclear Regulatory Research (RES), Nuclear Reactor Regulation (NRR), Nuclear Material Safety and Safeguards (NMSS), and a regional representative. The CRGR work was carried out during this assessment period in accordance with Revision 7 of the CRGR Charter, effective November 18, 1999, which describes the CRGR's current mission and scope of activities.

The mission of the CRGR is to ensure that proposed generic actions (e.g., bulletins) to be imposed on NRC-licensed power reactor and selected nuclear materials licensees are appropriately justified based on backfit provisions of applicable NRC regulations and the Commission's backfit policy. These regulations include 10 CFR 50.109, 50.54(f), and 2.204 for power reactors, and 10 CFR 70.76, 72.62, and 76.76 for nuclear materials facilities. Revision 3 of NUREG/BR-0058, "Regulatory Analysis Guidelines of the U. S. Nuclear Regulatory Commission Final Report July 2000," provides guidance relevant to backfit cost/benefit analysis.

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The CRGR's primary responsibilities are to recommend to me either approval or disapproval of the staff proposals of new or revised generic requirements and to provide assistance to the NRC program offices to help them implement the Commission's backfit policy.

To accomplish its mission, the CRGR reviews and evaluates proposed new and revised power reactor regulatory requirements, generic correspondence, regulatory guidance, and selected NRC staff guidance on licensing, inspection, assessment, and enforcement that could impose a backfit. The CRGR also reviews and evaluates selected nuclear materials issues and proposed new materials-related requirements, generic correspondence, and regulatory guidance, as requested by the NMSS Director or the EDO. CRGR review of inspection guidance will either be at the specific request of staff or by the CRGR's self initiation.

The CRGR reviews NUREGs only if they are used to support a new staff position. The Committee reviews safety evaluation reports endorsing generic vendor initiatives only at the program Office Director's request. The CRGR reviews the administrative controls related to the NRC staff's generic backfit management practices to ensure NRC's processes (in particular, the office and regional procedures) are adequate and that staff guidance is comprehensive and clear. As part of its review of the effectiveness of the NRC's generic backfit management process, the CRGR holds periodic meetings with stakeholders.

During this assessment period, the CRGR reviewed proposed new generic actions and evaluated their potential for improper or unjustified backfits consistent with its Charter. In doing so, the CRGR also identified pertinent technical, procedural, and legal issues.

The CRGR held 13 meetings from June 2002 through May 2003 involving 14 proposed generic actions (two meetings involved discussions among the CRGR members concerning the CRGR report titled, "Review of Administrative Controls for Plant Specific Backfits.") NRR sponsored all except two of the generic actions presented to CRGR. NMSS and RES sponsored the remaining issues. Attachment 1 contains a list of items reviewed by the CRGR during this period.

In addition, the CRGR Chairman and staff continued to screen Regulatory Guides for potential backfits. This screening procedure results in a reduced number of Regulatory Guides that the full CRGR has to review. Only Regulatory Guides that actually have backfit potential or deal with key issues before the Commission are brought to the full Committee.

How effectively the CRGR added value to proposed generic packages was assessed according to the following three categories and their implementation:

1. Identification of improper, unjustified, or implicit backfits.

The CRGR's mission is to ensure that proposed generic backfits to be imposed on NRC-licensed power reactor and selected nuclear materials licensees are appropriately justified based on the backfit provisions of applicable NRC regulations and the Commission's backfit policy. Appendices C and D of the CRGR Charter require that detailed backfit analyses be included in the information packages submitted to the CRGR. The process of preparing for a CRGR presentation focuses attention on the backfit provisions of applicable regulations and the potential impact on both the NRC and licensees. During this assessment period, this process generally resulted in the

staff ensuring that guidance documents were not inconsistent with backfit provisions of applicable regulations and that impacts on the NRC and licensees were assessed and explained. However, the CRGR review did identify a previously unidentified backfit in a rulemaking package and, in several instances, identified unintended backfits in several staff-proposed requests for information. In the case of the rulemaking package, the staff was subsequently able to provide adequate justification for the backfit. For the proposed requests for information, the staff revised the language of the requests for information to eliminate the unintended backfits.

2. Identification of technical, procedural, or legal deficiencies, or flaws with respect to policy presented to the CRGR.

In addition to technical expertise from the program offices, a senior manager from the OGC participates as a member of CRGR to identify legal deficiencies or flaws in proposed staff actions with respect to Commission rules, policies, and directives. Staff proposals benefitted from CRGR reviews because the review better ensured consistency with the Commission's rules, policies, and directives, or provided improvements from a process perspective.

3. Significance of the issues raised by CRGR compared to the impact on schedules and resources expended to address those issues.

The CRGR Chairman and staff worked with program office staff to eliminate potential backfits in regulatory guidance before public comment and CRGR review. Also, the CRGR ensured that the presenters had an understanding of what was needed so that there would be no impact on their schedules. CRGR meetings and reviews were specially arranged, as necessary, to meet program office schedule demands. Meeting minutes were focused on backfit issues with comments aimed at eliminating improper, unjustified, or implicit backfits. As a result, program staff effort in responding to CRGR comments and recommendations was minor in most cases, and CRGR review did not significantly impact the scheduled issuance of rulemaking or generic regulatory guidance during this assessment period. (In one case, the review of a generic letter was delayed due to the request by the sponsoring office that a higher priority bulletin be substituted during the scheduled meeting. This resulted in several weeks delay to reschedule the review of the generic letter.) The CRGR recognizes the resources program offices expend to prepare a presentation to the CRGR. To prevent unnecessary delays for the program offices, the CRGR encourages offices to work with the CRGR staff early in their processes to ensure they understand what is needed and to schedule a CRGR meeting at the appropriate time.

As part of its review of the effectiveness of the NRC's generic backfit management process, the CRGR holds periodic meetings with external stakeholders. In this regard, CRGR members participated in the "Industry Feedback on Backfitting and Generic Requirements Breakout Session" of the Nuclear Energy Institute (NEI) Licensing Forum on November 6, 2002. During this session, the CRGR Chairman and several CRGR members (along with an industry representative) sat on a panel and solicited feedback on the generic backfit process and addressed questions posed by members of the audience. The attendees were also informed that the CRGR has taken steps to address the concerns previously raised from the 2001 NEI Licensing Forum.

During the November 2001 NEI Licensing Forum, industry representatives raised concerns regarding the adequacy of NRC's controls for the plant-specific backfitting process. The CRGR members agreed with a proposal to review and determine if the backfit policy procedures used by the various offices and regions are adequate. A subgroup of the CRGR was established to conduct the initial review, which was initiated in August 2002. The CRGR subgroup engaged in various internal discussion with other CRGR members and conducted interviews with key Office Directors and all the Regional Administrators to discuss issues and recommendations identified during their review of the administrative backfit procedures used by the offices and regions. Comments from these discussions were addressed and a final report was provided to me for consideration. I intend to forward the report to the Commission for information and work with the staff offices to develop an approach for addressing the recommendations.

Finally, the CRGR continues to seek feedback from those who come before the CRGR to sensitize the Committee to potential concerns. Accordingly, CRGR invited program office input regarding CRGR review of staff proposals in a memorandum of May 29, 2003 (ADAMS Accession No. ML031490386). This memorandum asked for feedback regarding (1) CRGR's value added in improving the quality of the product, (2) staff efforts expended in addressing CRGR comments and recommendations, (3) impact on schedule, and (4) the significance of the issues and associated costs in terms of overall impact on schedules and resources. Attachment 2 provides a summary of the comments received from program offices on specific CRGR meetings in response to the CRGR request in a memorandum of May 29, 2003, for assessment of its functions and activities.

In their assessment of value added by the CRGR review, the offices indicated that, in general, the CRGR review was beneficial. The CRGR comments and recommendations improved the staff proposals by helping the staff focus on the underlying safety concerns, improving the quality of the final products, and making the products consistent with the Commission's policies, rules, and regulations. Furthermore, in general, there was no significant staff effort expended nor any noticeable impact on resources to address the CRGR comments and recommendations. Responses from two of the offices on the significance of the issues raised and the associated cost were positive; however, the other office stated that there was no staff consensus on whether the benefit of CRGR review justified the cost. Overall, considering the office responses and CRGR's assessment of the significance of issues the committee raised (e.g., identification of unintended backfits), the CRGR believes that it has contributed to the agency's mission and added value by identifying potential backfits as well as technical, procedural, and legal issues.

Attachments: 1. Topics Reviewed by the CRGR
2. Program Office Assessments of CRGR activities

cc w/atts.: SECY
OGC
OCA
OPA
OCFO
OIP

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**TOPICS REVIEWED BY THE CRGR
BETWEEN JUNE 1, 2002, AND MAY 31, 2003
(CRGR Meeting Numbers 373 through 385)**

CRGR Meeting No. 373 (June 11, 2002)

E. Weiss (NRR)	Discussion on the NFPA 805 Fire Protection Rulemaking
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CRGR Meeting No. 374 (June 25, 2002)

S. Tingen (NRR)	Discussion on the Final Draft Rule Revising 10 CFR 50.55a, "Codes and Standards"
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CRGR Meeting No. 375 (July 31, 2002)

M. Marshall (NRR)	Proposed Bulletin 2002-02, "Reactor Vessel Head and Reactor Vessel Head Penetrations Inspection Programs"
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S. Tingen (NRR)	Discussion on the staff's response addressing the CRGR backfit concerns on the Final Draft Rule Revising 10 CFR 50.55a, "Codes and Standards"
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CRGR Meeting No. 376 (October 21, 2002)

CRGR members	Discussion by Bruce Mallett and Margaret Federline on the results of the "Review of Office Administrative Procedures for Backfit Controls" (see below, "Review of Administrative Controls for Plant Specific Backfits")
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CRGR Meeting No. 377 (October 30, 2002)

M. Ripley (NRR)	Discussion on the Final Rule to Standardize the Process for Allowing a Licensee to Release Part of its Reactor Facility or Site for Unrestricted Use Before NRC Has Approved its License Termination Plan
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CRGR Meeting No. 378 (November 18, 2002)

T. Croote (NRR)	Discussion on "Criteria for the Treatment of Individual Requirements in a Regulatory Analysis"
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CRGR Meeting No. 379 (January 28, 2003)

S. Bloom, M. Marshall, A. Hiser (NRR)	Proposed Order Modifying Licenses (the order addresses the modification of reactor vessel head inspection procedures in PWR plants)
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CRGR Meeting No. 380 (January 29, 2003)

CRGR members	Discussion by Bruce Mallett and Margaret Federline on the final draft report of the "Review of Office Administrative Procedures for Backfit Controls"
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CRGR Meeting No. 381 (February 20, 2003)

E. Murphy (NRR)	Proposed Generic Letter, "Requirements Relating to Steam Generator Tube Inspection"
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CRGR Meeting No. 382 (March 25, 2003)

S. Weerakkody (NRR)	Proposed Backfit Order to install backup power for hydrogen igniters in Ice Condenser and Mark III type containments and to discuss the proposed approach (Order versus Rulemaking)
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CRGR Meeting No. 383 (April 8, 2003)

J. Lehning (NRR)	Draft Bulletin 2003-XX, "Potential Impact of Debris Blockage on Emergency Sump Recirculation of Pressurized Water Reactors"
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H. Tovmassian (NRR)	Proposed Rule, "Incorporation by Reference of ASME Boiler and Pressure Vessel (BPV) & Operation and Maintenance (OM) Code Cases"
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W. Norris (RES)	Draft Final Regulatory Guide (RG) 1.84, Rev. 32, (DG-1090), "Design, Fabrication, and Materials Code Case Acceptability, ASME Section III, Division 1"
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	Draft Final Regulatory Guide 1.147, Rev. 13 (DG-1091), "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1"
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	Draft Final Regulatory Guide 1.192 (DG-1089), "Operation and Maintenance Code Case Acceptability, ASME OM Code"
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Draft Final Regulatory Guide 1.193 (DG-1112),
"ASME Code Cases Not Approved for Use"

CRGR Meeting No. 384 (April 22, 2003)

M. Blumberg, M. Reinhart (NRR)

Draft Final Generic Letter, "Control Room
Habitability" and supporting Regulatory Guides

Supporting Documents:

- (1) Draft Regulatory Guide DG-1111, "Atmospheric Relative Concentrations for Control Room Radiological Habitability Assessments at Nuclear Power Plants"
- (2) Draft Regulatory Guide DG-1113, "Methods and Assumptions for Evaluating Radiological Consequences of Design Basis Accidents at Light Water Nuclear Power Reactors"
- (3) Draft Regulatory Guide DG-1114, "Control Room Habitability at Light Water Nuclear Power Reactors"
- (4) Draft Regulatory Guide DG-1115, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors"

CRGR Meeting No. 385 (May 20, 2003)

A. Giantelli, (NMSS)
W. Troskoski, (NMSS)

Proposed Bulletin, "Hunt UF₆ Valve"

**Program Office Assessment of CRGR Activities
From June 1, 2002, through May 31, 2003**

DISCUSSION

In accordance with Revision 7 of the CRGR Charter, effective November 18, 1999, the CRGR's primary responsibilities are (1) to recommend to the EDO either approval or disapproval of staff proposals for new or revised generic requirements and (2) to provide guidance and assistance to the NRC program offices to help them implement the Commission's backfit policy on nuclear power reactors and materials facilities.

The effectiveness of the CRGR in terms of value added by its reviews was determined by the significance of the issues raised and the associated costs, as measured by staff efforts expended and schedule impacts, if any. This was accomplished by the CRGR's self-assessment of its activities and by soliciting input from the program offices that sponsored actions reviewed by the CRGR during this assessment period.

The CRGR Chairman and staff also considered the adequacy and quality of incoming proposals when they were submitted for formal review by a program office. During this assessment period no proposals were rejected.

In a memorandum dated May 29, 2003, to the program Office Directors, the CRGR Chairman invited their assessments of value added by CRGR review of proposals sponsored by their office. They were asked to answer the following four questions to evaluate the CRGR's effectiveness:

- (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).
- (2) The staff efforts expended in addressing CRGR comments and recommendations, excluding the time required for OGC and program office re-concurrence.
- (3) Impact on schedule, if any.
- (4) Your assessment of the significance of the issues and associated costs, in terms of overall impact on schedules and resources.

The program offices addressed these four questions in their responses for their respective staff proposals. The offices indicated that, in general, the CRGR reviews were beneficial and added value to the products without significant impact on schedules or staff resources.

The offices stated that the CRGR comments and recommendations improved the staff proposals by helping the staff to focus on the underlying safety concerns, capturing implicit backfits, and making the products consistent with the Commission's rules and regulations.

The Office of Nuclear Security and Incident Response did not sponsor any issues for CRGR review during this assessment period. The highlights of the program office assessments of value added by CRGR reviews are summarized below:

NRR Overall Assessment

- (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 re-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.

RES Overall Assessment

- (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).**

Four draft final regulatory guides developed by RES were reviewed during this period. The guides endorsed Code Cases issued by the American Society of Mechanical Engineers (ASME). Code Cases are alternatives to the ASME Code voluntarily implemented by licensees. Hence, it was determined that there were no backfit issues. Nonetheless, the RES project manager concluded that the CRGR review did result in positive changes to the package which clarified certain provisions relative to implementation.

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

The CRGR recommended clarifications in wording that were straightforward and easy to complete.

- (3) Impact on schedule, if any.**

The Chairman of the CRGR went on official travel after the meeting but appointed another CRGR member to act on his behalf. Thus, the modifications to the packages were verbally accepted on the same day that the revised package was submitted.

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

As indicated in (2) above, the changes were straightforward and had little impact on schedules and resources.

It should be noted that the CRGR held a special meeting to accommodate the staff’s schedule relative to the EDO due date for this package. As indicated in (2) and (3) above, the CRGR took deliberate actions to minimize impacts on schedules and resources.

With regard to other RES staff actions, the CRGR supported the staff by reviewing the draft Regulatory Guide 1.174 package and providing written comments without a formal meeting. The CRGR waived formal review on two other RES guides. For example, the CRGR agreed with the staff that one of the guides applied only to applicants for new construction and therefore, there were no backfit issues and CRGR waived formal review.

Finally, the CRGR has been flexible with respect to the sequence of reviews with the ACRS for the revision to Regulatory Guide 1.82 (ECCS performance) to support the staff’s aggressive schedule for comment resolution. This will assist RES in issuing guidance in a timely manner to support NRR’s plan for resolution of GSI-191. The CRGR is to be commended for their actions in accomplishing their prescribed duties while at the same time supporting staff objectives.

NMSS Overall Assessment

It is noted that in this evaluation period, NMSS presented only one item before the CRGR for review, Draft Bulletin, "Hunt UF₆ Valve" (see CRGR Meeting No. 385)

- (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).**

The CRGR review added substantial value to the draft bulletin that was brought before the committee. The recommendations included: (1) strengthen the discussion section and describe the urgency of the safety issue, (2) revise the order and logic of the requested information, (3) better define the scope and population of covered components, (4) clarify who has ownership and responsibility for responding to the requested information, and (5) the development of Temporary Instructions. In the staff's view, the recommendations were helpful in ensuring that the technical concerns were clearly communicated to the stakeholders and the public. The committee members provided the right level of both technical and agency policy overview. Questions posed by the committee members to the staff during the review were effective in focusing the staff's attention on the broader issues needed to effectively address a highly technical and specialized issue that will affect a broad spectrum of component users.

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

Since the bulletin was to be jointly issued by two different organizations within NMSS (i.e., FCSS and SFPO), considerable time and effort were expended to revise the draft. A significant portion of that time and effort was due to the involvement of additional staff, who brought in a fresh view regarding some aspects of the bulletin that were not directly related to the CRGR comments.

- (3) Impact on schedule, if any.**

The CRGR aided the staff in achieving a timely review by scheduling a special session at the staff's request and providing specific comments at the end of the meeting. It was also helpful that CRGR agreed to review the incorporation of changes through e-mail versus another meeting.

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

The CRGR provided invaluable insights that needed to be addressed by NMSS. After completion of the staff's revision, one new issue was brought forward by a CRGR member that was not part of the original CRGR comments. Resolution of the issue required further coordination. The identification of new issues not originally identified as part of the CRGR review has the potential to significantly increase the cost in resources, and adversely affect initial scheduling decisions.

Memorandum dated: September 9, 2003

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COMMITTEE TO REVIEW GENERIC REQUIREMENTS

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