

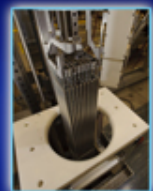
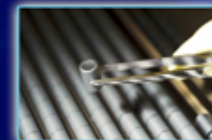


United States Nuclear Regulatory Commission

Protecting People and the Environment

NRC ENFORCEMENT PROCESS

Doug Starkey
Senior Enforcement Specialist
Office of Enforcement
September 8, 2011

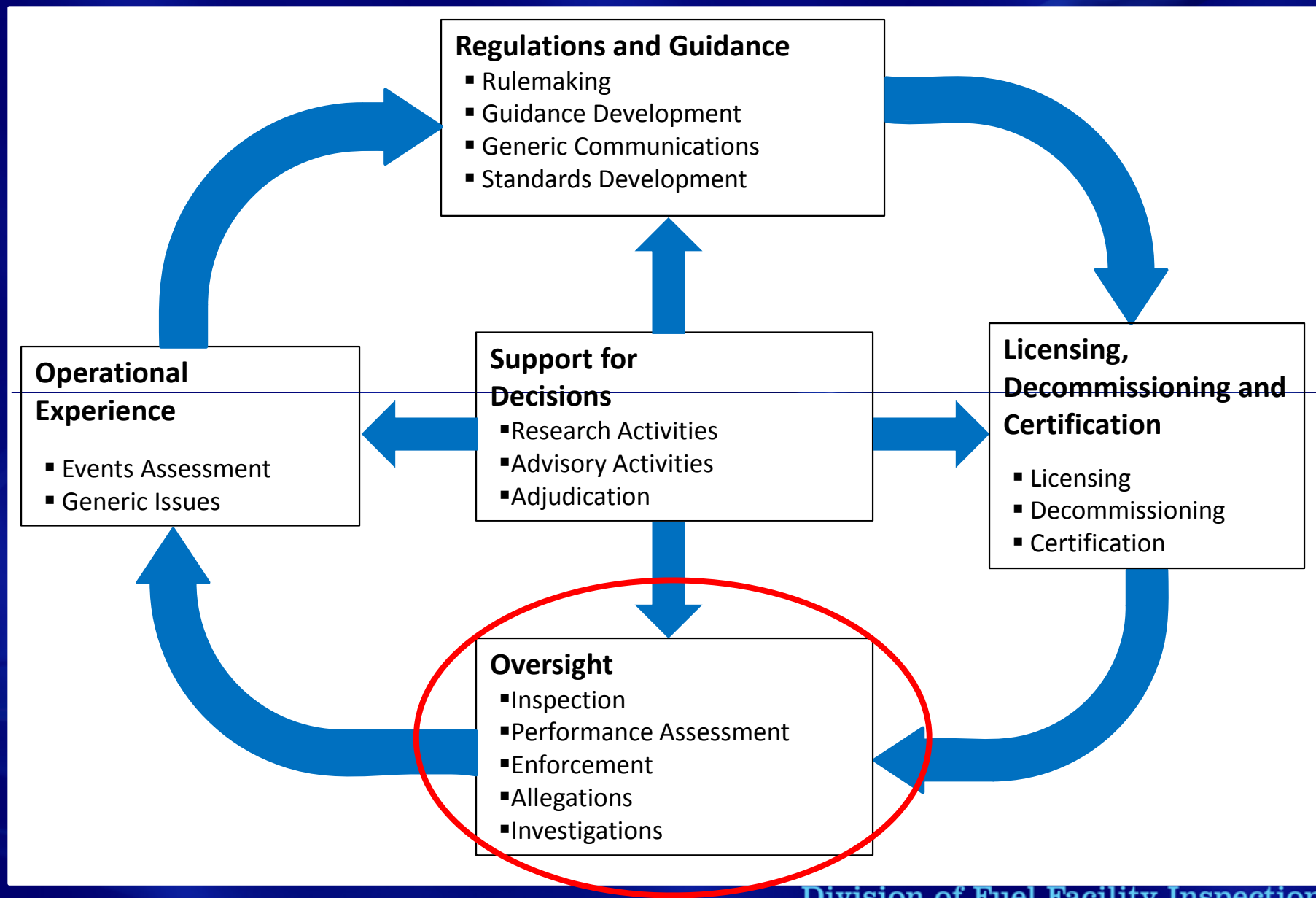


Division of Fuel Facility Inspection

Discussion Topics

- Escalated Enforcement Process
- NRC Enforcement Policy
- Enforcement Sanctions
- Enforcement Actions-Statistics
- Non-Enforcement Tools

How the NRC Regulates



Inspection Program

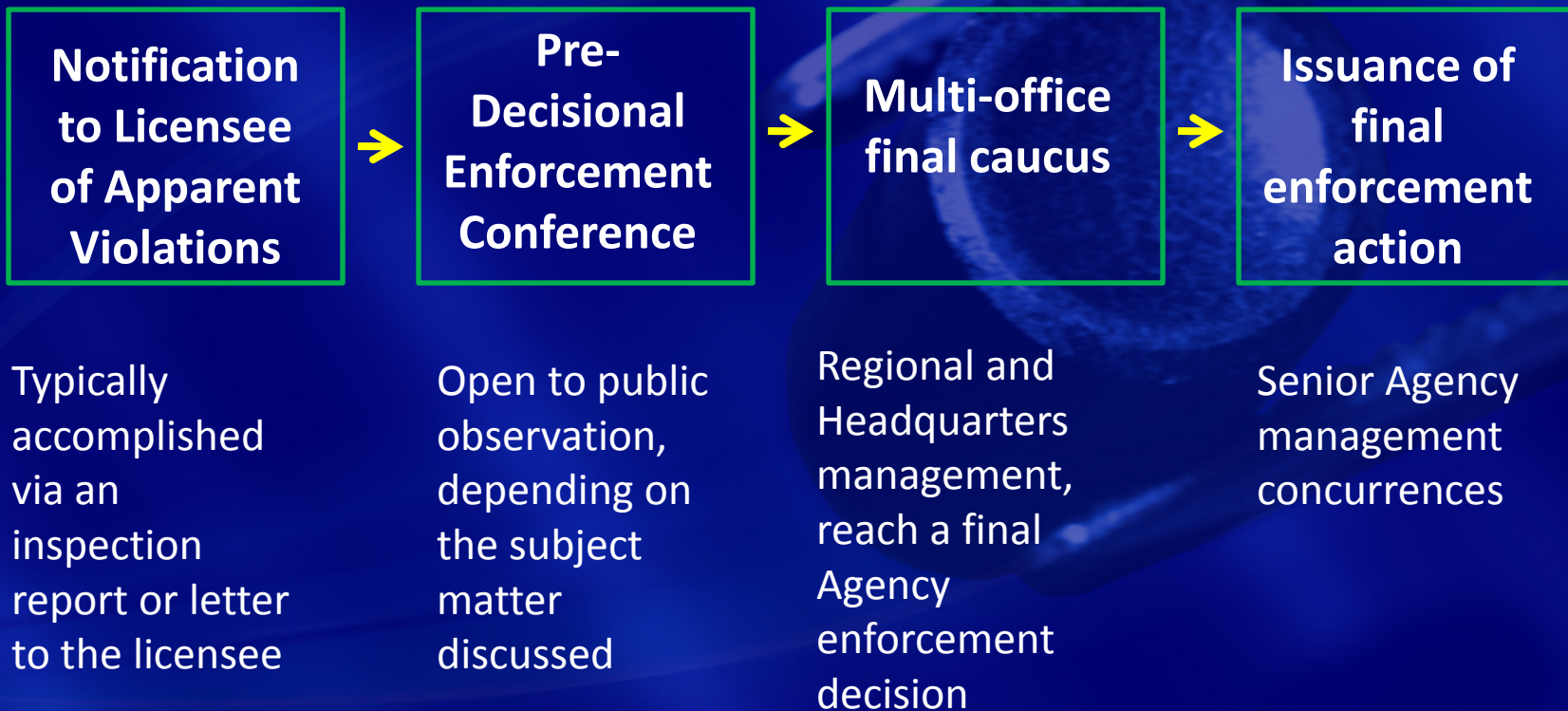
- Baseline inspections (resident, regional, & headquarters)
- Reactive Inspections (Augmented Inspection Team, Special Inspection Team, Incident Inspection Team)
- Focused inspections
- Diagnostic & other performance related inspections

ESCALATED ENFORCEMENT PROCESS



ESCALATED ENFORCEMENT PROCESS

continued



NRC Enforcement Policy

- Established by the Commission
- Not a 'regulation' or 'requirement'
- Last revised September 2010
- Next revision 2012

NRC Enforcement Policy

- Purpose:
 - To deter noncompliance
 - To emphasize importance of complying with NRC requirements
 - To encourage prompt identification & prompt comprehensive correction of violations of NRC requirements

Sanctions

- Three primary enforcement sanctions used by NRC:
 - Notices of Violation (NOV)
 - Civil Penalties
 - Orders

Violations

- Violations – categorized into Severity Levels I, II, III and IV, with SL I being the most significant
- Predecisional Enforcement Conferences – held to help NRC determine whether enforcement action is necessary

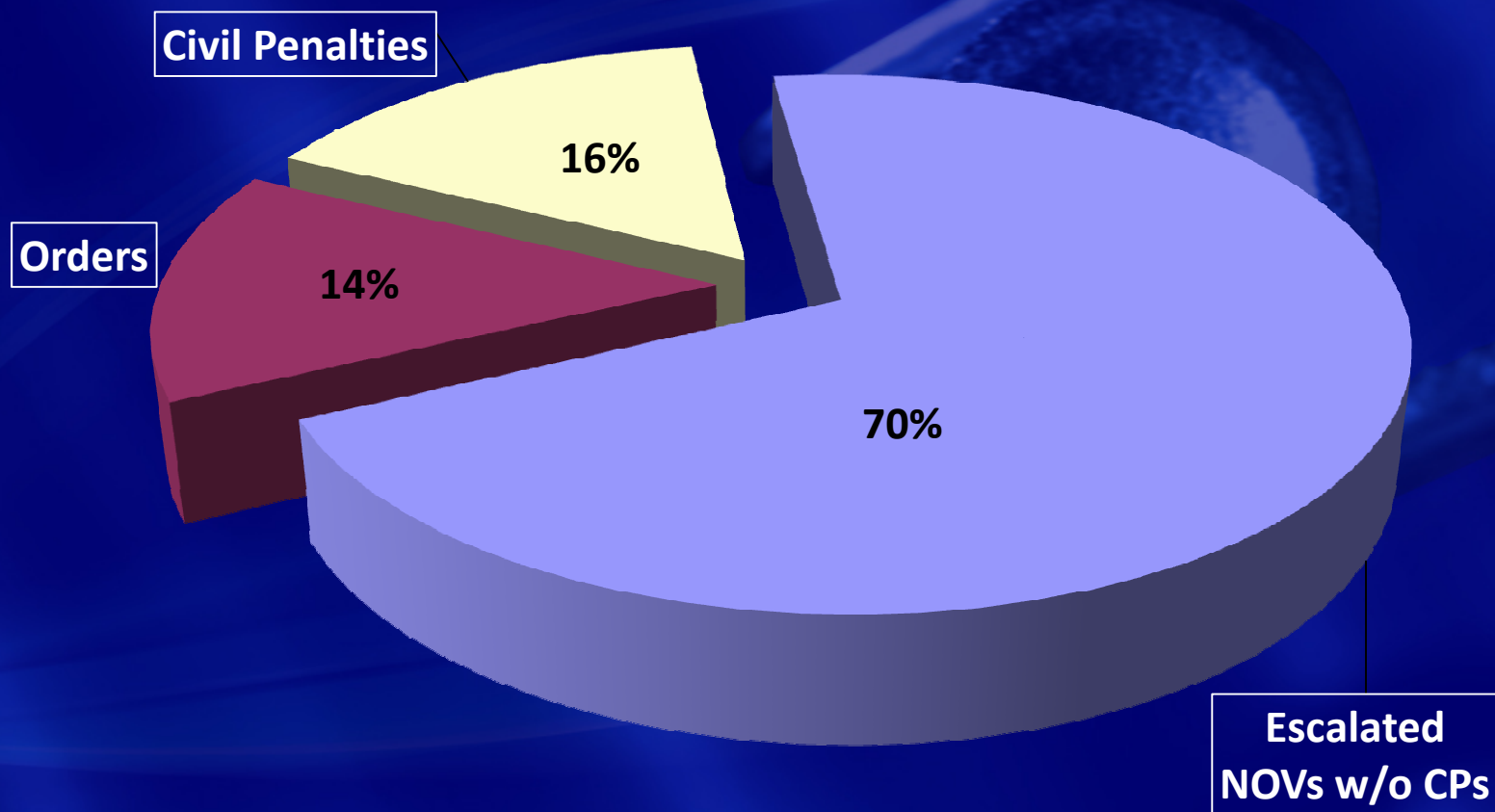
Violation Examples

- SL I, II, III and IV violation examples located in Section 6.0 of Enforcement Policy
- 14 activity areas within Section 6.0
- Violation examples are not intended to be exhaustive nor controlling

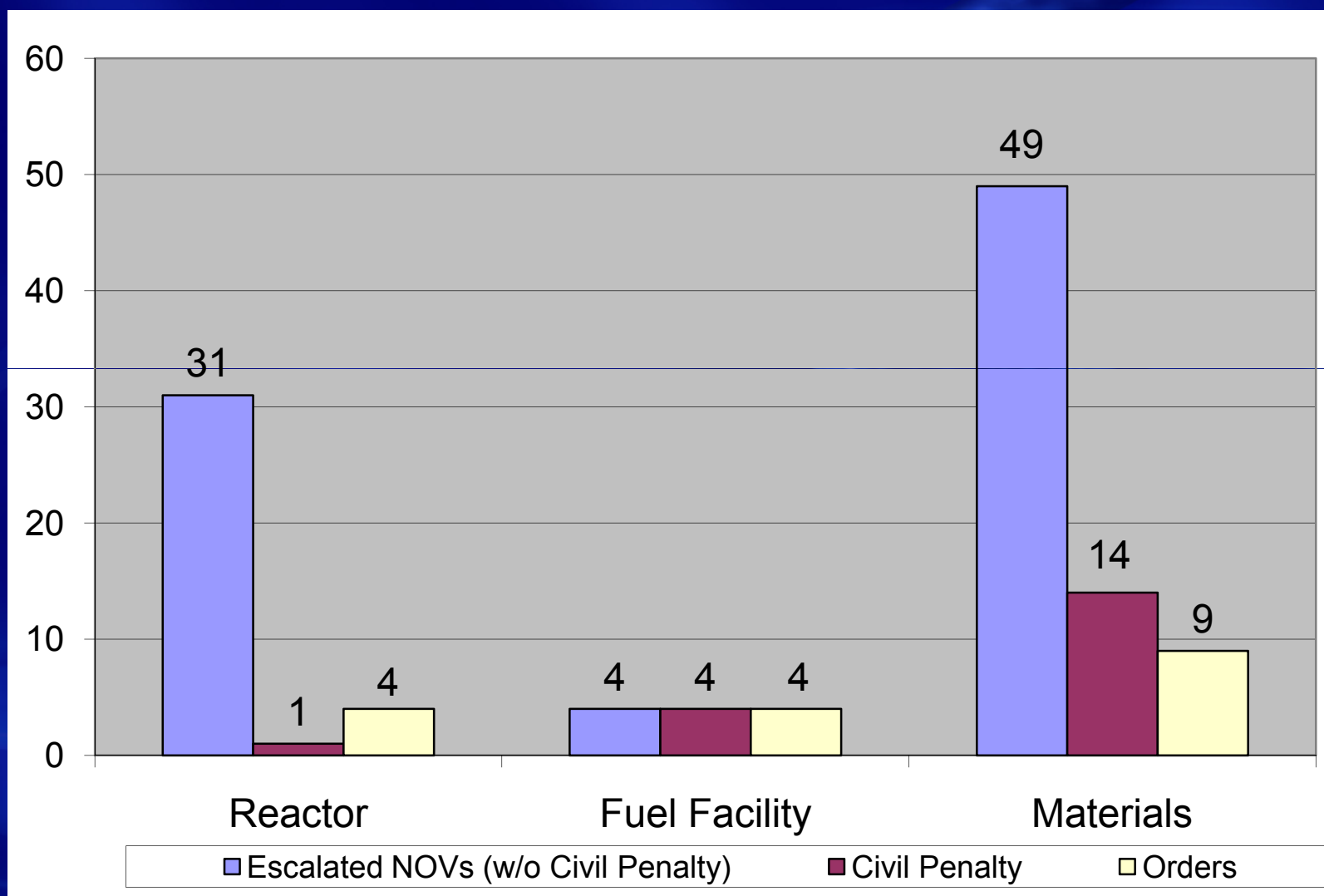
Severity Level Example

- Dose limit for a member of the public - 100 mrem/year (10 CFR 20.1301)
- Enforcement Policy, Section 6.7, Health Physics, violation examples:
 - Severity Level I
Public dose > 1000 mrem
 - Severity Level II
Public dose > 500 mrem
 - Severity Level III
Public dose > 100 mrem

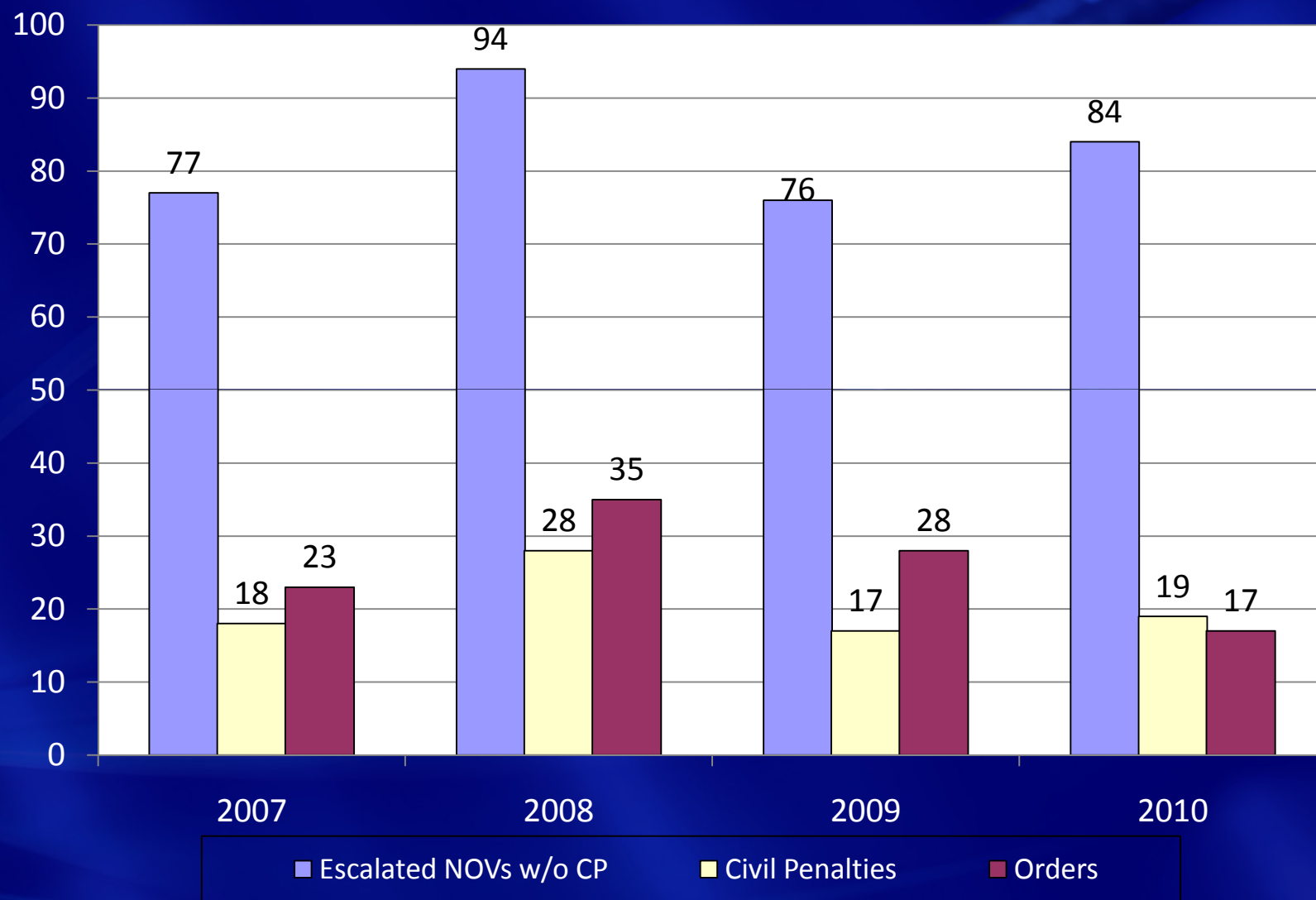
Nuclear Industry Escalated Enforcement by Type in CY 2010



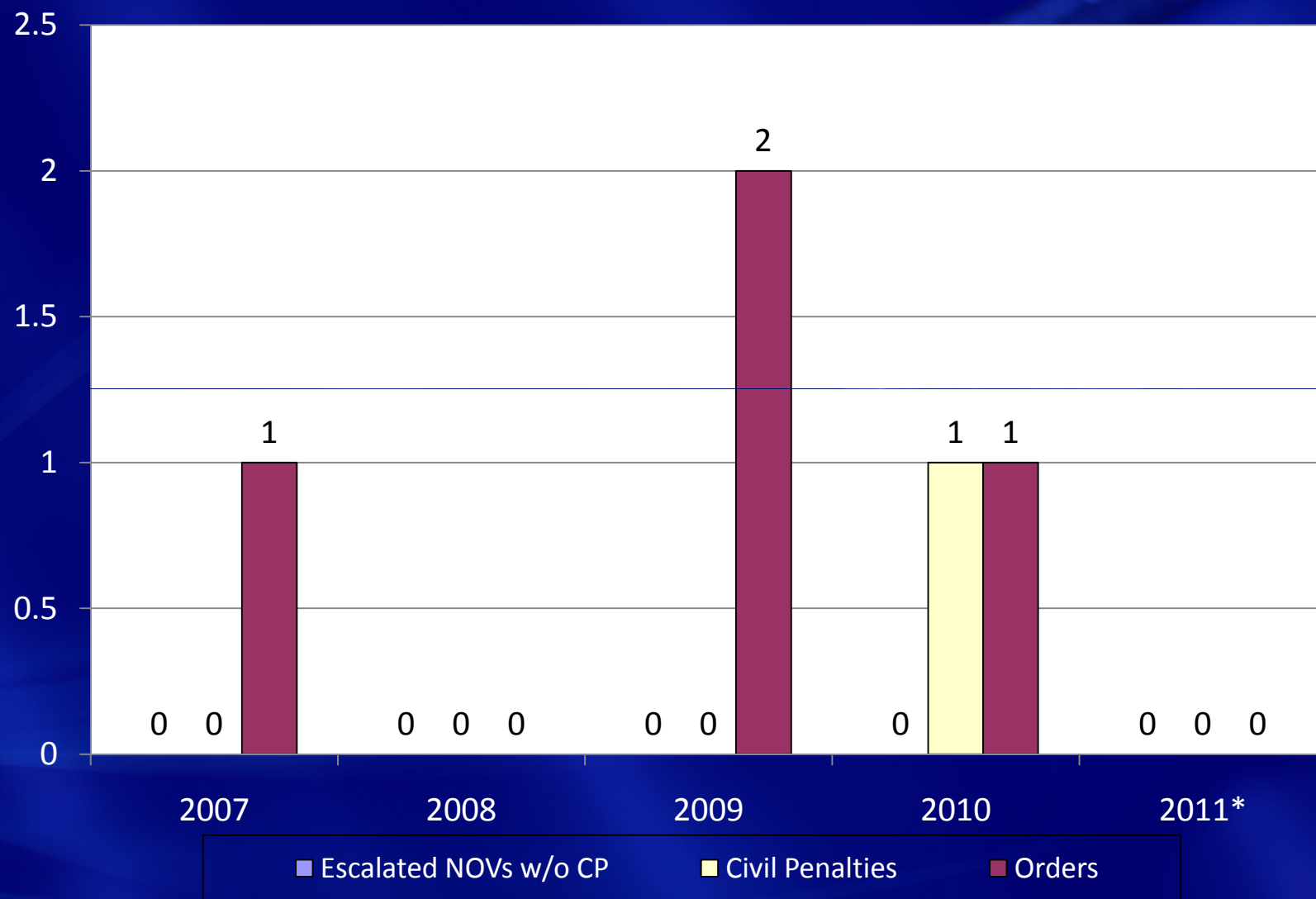
Nuclear Industry Escalated Enforcement by Licensee in CY 2010



Nuclear Industry Escalated Enforcement Trends



NFS Escalated Enforcement Trends



NON-ENFORCEMENT TOOLS

- Confirmatory Action Letters
- Management Meetings
 - Agency Action Review Meeting
 - Licensee Performance Review

Want a copy ?

NRC Enforcement Policy is
located on the web at:

[http://pbadupws.nrc.gov/docs/
ML0934/ML093480037.pdf](http://pbadupws.nrc.gov/docs/ML0934/ML093480037.pdf)

QUESTIONS?