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May 21, 2013

Mr. Lawrence E. Kokajko
Director, Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Case Studies on the Cost and Schedule Estimates used in Regulatory Analysis

Project Number 689

Dear Mr. Kokajko:

In the May 8, 2013 public meeting on the cumulative effects of regulation (CER), the NRC staff requested input on the industry's interest in supporting "case studies" to review the accuracy of cost and schedule estimates used in NRC's regulatory analyses. The Nuclear Energy Institute (NEI)¹ has discussed the development of case studies with the industry's chief nuclear officers. This letter provides our initial thoughts on moving forward with the project.

The industry will support the NRC staff in the development of case studies associated with specific regulations and regulatory actions. An industry issue task force is being formed of power plants that are willing to participate in the studies to assist in communication and coordination. The industry is willing to participate and discuss the resources associated with the implementation and management of the following issues:

- 10 CFR 50.48(c), NFPA 805, Fire Protection
- 2009 Amendment to Part 73, Power Reactor Security Requirements
- Subpart I to Part 26, Managing Fatigue

¹ The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

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The industry is assessing whether there are other regulatory actions that have a well-defined scope and that may provide additional insights on the accurate development of regulatory analyses.

In the May 8th meeting there was a discussion on a second set of case studies that would assess the overall cumulative impact at a plant from broad array of regulatory actions. The industry's proposed approach for addressing cumulative impact, prioritization and integrated plant-level scheduling, will address and resolve the issues that the second set of case studies would have identified. As such, the industry would not support a totally separate activity on developing case studies for a broad array of regulatory actions, at this time.

Prioritization and Integrated Schedule Template


The NEI Cumulative Impact Working Group is moving forward with the development of a template for prioritizing industry and regulatory activities. This includes issue/problem definition, development of success criteria and plant-level integrated schedules. The proposed industry approach will build on the Integrated Safety Assessment Program (ISAP) of the 1980s and 1990s and the 1992 Integrated Schedule Policy Statement. A project description paper is being developed and will be forwarded to the NRC as the basis for further discussion.

Once the industry and NRC staff have attained a common understanding on the project description we will move forward with pilot activities. Pilot plants and the NEI Cumulative Impact Working Group will develop and test draft implementing guidance following NRC staff review and input. Our goal is to complete the pilot activities, amend the draft guidance to reflect the lessons learned from the pilot activities and forward final guidance to the NRC for endorsement by the end of 2014.

These activities pertain to power reactors. Fuel cycle facilities will monitor the prioritization activities for power reactors and develop a separate prioritization scheme using their Integrated Safety Assessments as opposed to a probabilistic risk assessment.

The industry looks forward to continuing the discussions on cumulative impact and moving forward with the development of prioritization and integrated schedule processes.

Sincerely,



Adrian P. Heymer

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Mr. Patrick I. Castleman, NRC
Ms. Nanette V. Gilles, NRC
Mr. Victor G. Cusumano, NRC
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