Cumulative Impact Case Study Analysis and Recommendations

January 28th, 2014

Case Study Topics and Volunteers

- Managing Fatigue, Subpart I, 10 CFR 26 [73 FR 17176]; 2 companies (7 units)
- Power Reactor Security Requirements, 10 CFR 73 [74 FR 13926]; 12 sites
- NFPA 805, 10 CFR 50.48(c) [69 FR 33550]; 5 units

Cost Comparisons

- Fitness for Duty Rule – Subpart I (Managing Fatigue)
  - NRC cost estimate was 2-5x lower than implementation costs
- Security – 2009 Part 73 Rule
  - NRC Part 73.55 cost estimate was 19x lower than implementation costs
- NFPA 805
  - NRC cost analysis estimate was 6x lower than implementation costs

Issues and Recommendations

- Scope
  - The biggest factor identified as the reason for large differences in cost estimates versus actual implementation costs is the ambiguity of the scope and implementation details for the regulation or action.
  - Recommendation: Clearly define the scope, closure criteria and characteristics so that realistic resources can be estimated for compliance with the new action/position.

Issues and Recommendations

- Early release of regulatory analysis and detailed implementation guidance
  - When a new proposed regulation is published for comment, the NRC has already completed a significant amount of research and work with little to no public input on numbers and assumptions.
  - Recommendation: The scope, regulatory analysis and guidance of the regulation should receive early public input in order to help accurately estimate the costs and benefits of the regulation before the public comment period.

Issues and Recommendations

- Cost estimates in the regulatory analyses
  - Cost estimates in the regulatory analyses are presented at a high level and the assumptions and sources that make up the basis of the estimates are not provided in the analyses.
  - Recommendation: Regulatory analyses should include information on the basic assumptions and sources that drive the high level estimates and provide a range of estimates based on various sensitivities instead of single point estimates.

Questions and Discussion