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Conceptual Example of a Proposed Risk Management Regulatory Framework Policy Statement

Comment On: NRC-2013-0254-0027

Evaluation of a Proposed Risk Management Regulatory Framework; Request for Comment on Draft White Paper

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General Comment

The staff has concluded through the work done on this matter that the existing set of staff practices represents a de-facto risk-management regulatory framework (RMRF). For example, the NRC website at <<http://www.nrc.gov/about-nrc/regulatory/risk-informed/concept.html>> indicates that current practice incorporates integrated decision-making of the type described in NUREG-2150. The real question is whether the staff actually implements such practices when opportunities to do so present themselves. In my view, a systematic implementation of integrated decision-making occurs only under special circumstances. If normal and routine practice included such implementation, there would be no need for even considering a risk-informed alternative licensing basis or a plant specific RMRF. By extension, there would also be no need for another policy statement on using a risk management approach to ensure safety and security.

Hence, what is needed is to maintain the current framework but increase the rigor with which the ideas of risk-informed and performance-based integrated decision-making is practiced. It is a matter of fact recorded in previous comments associated with this matter that research reports supporting such decision-making remain in archives still awaiting use.

SUNSI Review Complete

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