From: Elliott, Robert
To: Dave Lochbaum
Cc: Taylor, Robert; King, Michael; McGinty, Tim; Lubinski, John; Dean, Bill
Subject: RE: Low risk compliance issues
Date: Tuesday, March 22, 2016 1:36:00 PM

Hi Dave,

Thank you for taking the time to review the presentation materials from our February 3rd public meeting and sending us your thoughts and concerns. You raise some interesting points. In response, I'd like to point out that the process we are considering is one that is focused on ensuring timely corrective action that is commensurate with the safety significance of the issue. It is not a process for identifying compliance issues which can then be ignored. I think you would agree that not every regulatory compliance issue is an immediate threat to public safety. This initiative is simply exploring how to effectively and efficiently identify low risk and low safety significance compliance issues, and then ensure that they are resolved in a timely manner.

The bottom line is that this initiative seeks to establish a structured risk-informed decision-making process that will ensure predictable outcomes that do not rely solely on staff knowledge to achieve resolution, consistent with our principles of good regulation. The process will help the staff to identify those low-risk compliance issues that are not an immediate threat to the public health and safety and allow licensees to more efficiently resolve them.

Again, I thank you for your time, and invite you to continue to participate in our public interactions as we continue to explore developing a process for enforcement discretion for low risk and low safety significance compliance issues.

Sincerely,
Rob Elliott

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