

10/17/2019 RITF Public Meeting Talking Points on Regulatory Guide Reviews

Topic:

Engaging external stakeholders to inform Regulatory Guide (RG) update process via external reviews

Benefits:

Provide opportunity for external input prior to Draft Guide (DG) development

- Planning and alignment of stakeholder resources
- Enhancing knowledge management
- Potential for gains in efficiency vs waiting for DG comments
- Increase transparency

Progress:

The Nuclear Regulatory Commission (NRC) and the Nuclear Energy Institute (NEI) have engaged in recent discussions to explore a pilot external review process for RGs

- NEI has submitted an informal draft review for RG 8.38, "Control of Access to High and Very High Radiation Areas of Nuclear Plants"
- NRC initial feedback
 - review identifies several technical issues for consideration
 - review could use more detail regarding generic stakeholder impacts
- NRC will further digest review and provide more comprehensive feedback to NEI on format and content

Future Plans:

- Additional RG review pilots from NEI?
- Consider additional external stakeholders
- Fine tune format and level of detail of external reviews
- Dispositioning external reviews and working into the NRC RG development process
- Resource implications for internal and external stakeholders
- Vehicle and frequency for requesting external reviews
- Introduction of concept for larger implementation based on successes

Topic 2 NRC SRP Modernization and review strawman:

- NEI: Can external review pilot for RGs inform the SRP process (NUREG-0800)?
- Concept has been shared with NRC process owner (Mark Notich, Lead PM)
 - Handful of SRPs will be piloted soon, input encouraged
- An Integrated Action Plan is scheduled for publication by end of 2019. Public meeting to be scheduled 1st quarter FY 2020 and presentation at the NRC's Regulatory Information Conference in Spring 2020.

Background:

- Background on SECY-19-0094 (ADAMS ML19151A557)
 - SRM-M180118 (ADAMS Accession No. ML18032A209)
 - Assessment frequency for guidance updates and balance of lessons learned and resource impacts
 - Frequencies are varied and mostly not identified, mostly done as needed
 - External inputs are a significant driver that inform the need for updates
 - Periodic reviews to inform updates is a best practice, written reviews rare
 - WG idea for engaging external stakeholders to inform update process via external reviews, provide an early input prior to DG comment period
- RGs have published reviews
 - Reviews typically 1-2 pages in length and is low resource
 - Regulatory and technical issues
 - Impacts on all stakeholders
 - Level of technical effort for NRC to revise
 - Staff's decision
 - Schedule for update
 - RGGIB has recently enhanced public website to highlight review decisions
 - RGGIB issues approximately 30-40 reviews per year
 - 50% Ok as is
 - 25% Issues for future
 - 25% revise