Summary of Ideas on Streamlining 50.55a

NOTE: The NRC staff has not vetted these ideas for legality or practicality. These ideas are intended for discussion purposes only.

- **Create a User's Guide for 50.55a**
  - Make no changes to 50.55a, but create a user's guide to enhance clarity
- **Documenting NRC Approved Votes and Code Cases for Incorporation in Rule**
  - Develop an alternate, streamlined process for allowing quick use of newly-published Code Cases
- **Change to Requirement on Updating ISI Programs**
  - Adjust the requirement for updating ISI programs to new editions of standards
- **Direct Final Rule for Unconditionally Approved Code Cases**
  - Utilize the direct final rule process for approved Code Cases, leaving more controversial Code Cases for a separate rulemaking using the normal process
- **Add a 50.59-Like Change Control Process to Allow Licensees to Make Minor Deviations from the Code without NRC Approval**
  - Authorize licensees to make some changes to their ISI programs that deviate from the ASME Code without NRC approval
- **Performance-Based Approach to ASME Standards**
  - Create a new regulatory path that allows licensees flexibility to adopt their own standards for design, inservice inspection, and inservice testing
- **Relocate the Text of 10 CFR 50.55a into a Regulatory Guide(s) and Incorporate the RG(s) into 50.55a**
  - Move the current rules to a Regulatory Guide, thereby allowing cleaner formatting for readability
- **Revisiting the Need to Mandate Codes and Standards by Removing Section III, XI and OM Codes from 50.55a Entirely**
  - Overhaul the current regulatory approach by no longer mandating ASME standards
- **Rewrite of 50.55a**
  - Make no changes to the regulatory approach, but rewrite 50.55a to improve clarity

Idea: Create a User's Guide for 50.55a.
POC: Michael Benson

Background:

- 50.55a is difficult to read because it is a reference to, and places conditions on specific aspects of, multiple complex secondary documents (ASME Code and Code Cases).
- The structure and organization of rules in the Code of Federal Regulations are dictated by the Office of the Federal Register instructions for publication.
- An NRC guidance document explaining the structure of 50.55a would allow existing regulatory practice, while also clarifying the rule.
- The guidance document could take any form (i.e., it does not have to be a Regulatory Guide), but the NRC would need to ensure it does not seem to replace the rule text.
- Other sources of guidance and clarification are limited. For example, the regulatory text on the NRC website has been formatted with indentions for subsections, which improves readability, but does not aid the reader in following cross references.

Analysis:

- Scope:
  - Minor update to existing regulatory practice.
- Regulatory impacts:
  - No regulatory impacts are expected related to this idea.
- Impact on internal stakeholders:
  - Internal stakeholders may have to commit resources to creating/updating the guidance document.
  - Internal stakeholders would have a resource available to understand 50.55a.
- Impact on external stakeholders:
  - External stakeholders would have a resource available to understand 50.55a.
- Potential for unintended consequences:
  - Low
- Relevant stakeholders:
  - NRC technical staff involved in ASME Code activities and Code-related licensing actions.
  - ASME
  - U.S. license-holders
  - Public interest groups

Resource Estimates:

- New effort for NRC staff that facilitates usability and clarity of 50.55a
- Does not impact 50.55a rulemaking effort
- Additional burden for NRC, so costs incurred must be justified relative to the benefit of having the User's Guide in place
- Initial costs
  - Initial draft of User's Guide: 6 months, 0.15 FTE
  - Engage internal stakeholders: 3 months, 0.15 FTE
  - Engage external stakeholders: 3 month, 0.1 FTE
  - Finalize document and concurrence: 4 months, 0.1 FTE
  - Total: 16 months, 0.5 FTE

- Long-term costs
  - User's Guide must be revised with each update of 50.55a
  - Assume 50.55a is updated once every two years
  - Review of changes to 50.55a: 1 month, 0.05 FTE
  - Draft changes to User's Guide: 0.5 month, 0.05 FTE
  - Engage internal stakeholders: 1 month, 0.1 FTE
  - Finalize document and concurrence: 1 month, 0.05 FTE
  - Total: 3.5 months, 0.25 FTE over 2 years

Idea: Documenting NRC Approved Votes and Code Cases for Incorporation in Rule
POC: David Rudland

Background:

- ASME Code Cases are alternatives to code requirements and are published quarterly.
- NRC position on ASME Code Cases is reflected in staff ASME Standards Committee vote.
- For ASME Section XI, NRC approved code cases (with and without condition) are published in Regulatory Guide 1.147, which is incorporated by reference in 10 CFR 50.55a. Section III and OM have similar structure.
- Over the last several revisions on RG1.147, greater than 60% of the code cases were unconditionally approved.
- The current code case rulemaking is incorporating RG 1.147 Rev 19, which deals with code cases from the 2013-2014 code edition. Therefore, the code case rule lags the code edition rule by 3 years, i.e., the current code edition rule focuses on the 2015-2017 code edition, and at this point by 5 years from the current code case status.
- If the industry wants to use a Section XI code case published in 2019, they will have to wait approximately 5 years before that code case is approved in 10 CFR 50.55a. The only process for them to apply an unconditionally approved code case before rulemaking is through the relief request (10 CFR 50.55a(z)) process.

Analysis:

- Scope:
  - ASME/EPRI/Industry develop a document that describes the process used for approving, without comment, ASME code cases.
  - NRC reviews, evaluates and IBRs that document in 50.55a
  - Remove unconditionally approved code cases from RG 1.147, etc.
  - Modify 50.55a(z) to say code cases that follow approved process can be used as alternatives to the code.
  - This would be an alternative approval process for use of some code cases
- Regulatory impacts:
  - Enforcement if code case not used properly
- Impact on internal stakeholders:
  - Review of code case prior to ASME vote would have to be more robust and inclusive
- Impact on external stakeholders:
  - Significantly decrease in burden for code case use.
- Potential for unintended consequences:
  - High
- Resource impacts:
  - High initial resource costs to create document and conduct required rulemaking
  - High resource savings in the long term.
  - High burden reduction for licensees in the long term.
- Relevant stakeholders:
  - NRC technical staff involved in ASME Code activities and Code-related licensing actions.
  - ASME
  - U.S. license-holders

- Public interest groups

Resource Estimate:

- Develop code case approval process - $1 Mil
- NRC approval of process via safety evaluation – 1 FTE
- IBR process and Modify 50.55a to allow alternative per process – 4 FTE
- Industry savings - Fewer relief requests - Assume 25 code case RR/year- Say each RR code $50K, total savings $1.25M/year
- NRC savings- Fewer relief requests - Assume 25 code case RR/year. Each RR costs about 0.1 FTE – 2.5 FTE/year
- Total resources: Loss (cost) of 5 FTE and $1 mil over the two years, but a gain (benefit) of 2.5 FTE/year and $3.75M/year

Idea: Change to Requirement on Updating ISI Programs
POC: Keith Hoffman

Background:

- 50.55a(f) and (g) require IST and ISI programs be updated to the latest edition of the OM Code and Section XI incorporated by reference during successive 120-month intervals.
- The Code inspection program is based on a 120-month inspection interval
- Industry has said these updates are very expensive (approx. $1M for ISI).
- Removal of the requirement to update to the latest edition was proposed in the 1990's and the Commission voted to continue the update practice.

Analysis:

- Scope:
  - Major upheaval of current practice.
  - Impacts multiple external stakeholders
  - Requires Commission approval
- Regulatory impacts:
  - Program updates not on a 120-month interval or some multiple of 120-months may create a tracking issue for licensees and inspectors.
  - May increase burden on regional inspectors.
  - May increase number of submitted alternatives if updates are less frequent.
- Impact on internal stakeholders:
  - Staff resources necessary to obtain Commission approval of change.
  - Possible increase in review of proposed alternatives.
- Impact on external stakeholders:
  - Licensee reduction in update costs.
  - Licensee possible increase in proposed alternatives.
  - General public concerns about major relaxation of long-standing, successful regulatory practice.
- Potential for unintended consequences:
  - High
- Resource impacts:
  - High initial resource costs to engage internal and external stakeholders
  - Burden reduction for licensees in the long term.
- Relevant stakeholders:
  - NRC technical staff involved in ASME Code activities and Code-related licensing actions.
  - NRC regional inspectors
  - ASME
  - U.S. license-holders
  - Public interest groups

Resource estimates:

- Engage Internal Stakeholders: 6 months, 0.2 FTE
- Engage External Stakeholders: 6 months, 0.2 FTE
- Draft SECY Paper to Commission: 12 months, 0.2 FTE
- Commission response: 12 months, 0 FTE
- Initial draft of new regulations: 3 months, 0.1 FTE

- Finalize rulemaking and concurrence: 3 months, 0.1 FTE
- Respond to public comments: 3 months, 0.1 FTE
- Finalize rulemaking and concurrence: 3 months, 0.1 FTE
- Total: 4 years, 1.0 FTE, $250,000

Idea: Direct Final Rule for Unconditionally Approved Code Cases
POC: David Rudland

Background:

- ASME Code Cases are alternatives to code requirements and are published quarterly.
- NRC position on ASME Code Cases is reflected in staff ASME Standards Committee vote.
- For ASME Section XI, NRC approved code cases (with and without condition) are published in Regulatory Guide 1.147, which is incorporated by reference in 10 CFR 50.55a. Section III and OM have similar structure.
- Over the last several revisions on RG 1.147, greater than 60% of the code cases were unconditionally approved.
- The current code case rulemaking is incorporating RG 1.147 Rev 19, which deals with code cases from the 2013-2014 code edition. Therefore, the code case rule lags the code edition rule by 3 years, i.e., the current code edition rule focuses on the 2015-2017 code edition, and at this point by 5 years from the current code case status.
- If the industry wants to use a Section XI code case published in 2019, they will have to wait approximately 5 years before that code case is approved in 10 CFR 50.55a. The only process for them to apply an unconditionally approved code case before rulemaking is through the relief request (10 CFR 50.55a(z)) process.

Analysis:

- Scope:
  - Remove the unconditionally approved code cases from RG 1.147, RG 1.84, RG 1.192 and create a new RG.
  - Leave the current rulemaking as is.
  - Modify the RG process to release RG within a few months
  - Develop new direct final rule each year for the RG that IBRs the unconditionally approved code cases – develop rulemaking templates for quick execution
- Regulatory impacts:
  - May increase NRC burden initially with additional rulemaking
- Impact on internal stakeholders:
  - A bit more work in reviewing code cases as they are published
  - May ask some offices to rely on prior concurrence of templates
- Impact on external stakeholders:
  - Should allow the use of unconditionally approved code cases within 1 year of publication.
  - May draw more questions from public
- Potential for unintended consequences:
  - Low
- Resource impacts:
  - High initial resource costs to develop process and templates
  - Additional rulemaking cost with DFR
  - Taking a small risk on resource savings: a substantial public comment on direct final rule could require a second FRN. The risk is small because the code case in question could be removed from DFR.

    - Large burden reduction for licensees in the long term.
    - Fewer relief requests.
- Relevant stakeholders:
    - NRC technical staff involved in ASME Code activities and Code-related licensing actions.
    - U.S. license-holders
    - Public interest groups

Resource estimates:

- Modification of RG publishing process for report with unconditionally approved code cases, i.e., single table – 0.5FTE
- Development of templates for code case DFR process – 0.5FTE
- Additional technical staff time to ensure technical adequacy before vote – 0.25FTE
- Additional DFR rulemaking per year – 1.0FTE/year
- Reduction in tech staff time in original rule, i.e., tech staff will spend less time reviewing code cases, since the unconditional ones will be reviewed upfront – 0.25FTE
- NRC savings - Fewer relief requests – Assume 25 code case RR/year… say 50% of code cases are unconditionally approved. On average, we would save resources on 13 RR/year. Each RR costs about 0.1 FTE – 1.3 FTE/year
- Industry burden savings– Fewer relief requests – Say each RR code $50K, total savings $1.25M
- Total resources: Loss (cost) of 2.25 FTE (~$550,000) the first year, but a gain of 1.3 FTE/year (~$350,000) and an additional $1.25M/year from avoided relief requests

Idea: Add a 50.59-Like Change Control Process to Allow Licensees to Make Minor Deviations from the Code without NRC Approval
POC: Michael Benson

Background:

- Licensees currently have three options: follow the code, code cases, or request relief/an alternative.
- They are not allowed to make even minor deviations without NRC approval.

Analysis:

- Scope:
  - Scope depends on the maximum flexibility the staff could technically accept.
  - Could be different for different Code sections or topics.
  - Spans multiple NRC Offices
  - Impacts multiple external stakeholders
- Regulatory impacts:
  - Adds a new process to be inspected
  - Adds new site-specific requirements for licensees and inspectors to track
- Impact on internal stakeholders:
  - Difficult process to identify criteria for acceptable changes.
  - Would add new area of consideration for future Code editions and Code Cases
- Impact on external stakeholders:
  - Could affect considerations on revisions to Code.
  - Licensee concerns about rewriting/tracking inservice inspection plans.
  - General public concerns about relaxation of long-standing, successful regulatory practice.
- Potential for unintended consequences:
  - Low to moderate – if well considered, the flexibility for licensees could be kept within acceptable limits, but there is potential for error by licensees and unforeseen applications of the change process.
- Resource impacts:
  - High initial resource costs to engage internal and external stakeholders
  - Moderate resource savings in the long term from reduced relief/alternatives requests.
- Relevant stakeholders:
  - NRC technical staff involved in ASME Code activities and Code-related licensing actions.
  - ASME
  - U.S. license-holders
  - Public interest groups

Resource Estimates:

- Draft SECY paper to Commission: 12 months, 0.2 FTE
- Commission response: 24 months, 0 FTE
- Initial draft of change control process: 6 months, 0.2 FTE
- Engage internal stakeholders: 6 months, 0.1 FTE
- Engage external stakeholders: 6 months, 0.1 FTE
- Finalize rulemaking and concurrence: 6 months, 0.2 FTE
- OFR review/OMB review/publish rulemaking: 18 months, 0 FTE

- Public comment period: 6 months, 0 FTE
- Address public comments: 6 months, 0.2 FTE
- Revise rulemaking 2 months, 0.1 FTE
- Engage internal stakeholders: 2 months, 0.1 FTE
- Finalize rulemaking and concurrence: 6 months, 0.1 FTE
- OFR review/OMB review/publish rulemaking: 9 months, 0 FTE
- Total: 9 years, 1.3 FTE (~$350,000)

Idea: Performance-Based Approach to ASME Standards
POC: Michael Benson

Background:

- 50.55a is currently prescriptive in that it requires the use of ASME Section III and XI for design and inservice inspection, respectively
- The current approach may not be feasible for next generation reactor designs
- A performance-based approach may allow an applicant/licensee to choose any standard

Analysis:

- Scope:
  - Major overhaul of existing regulatory practice
- Regulatory impacts:
  - Eliminates the need to update 50.55a as new standards are published
  - NRC loses authority to enforce the application of a particular standard
- Impact on internal stakeholders:
  - Technical staff may have safety concerns with allowing such flexibility
  - May impact the reactor oversight process and Regional staff
- Impact on external stakeholders:
  - Applicants and licensees gain flexibility and reduced burden
  - Members of the general public may have safety concerns about eliminating a long-standing successful regulatory process
  - ASME may suffer loss of influence if Sections III and XI lose status
- Potential for unintended consequences:
  - High
- Relevant stakeholders:
  - NRC technical staff involved in ASME Code activities and Code-related licensing actions.
  - ASME
  - U.S. license-holders
  - Public interest groups

Resource Estimates:

- Draft SECY paper to Commission: 12 months, 0.4FTE
- Commission response: 12 months, 0 FTE
- Initial draft of new regulation: 12 months, 0.6 FTE
- Engage internal stakeholders: 6 months, 0.4 FTE
- Engage external stakeholders: 6 months, 0.4 FTE
- Finalize rulemaking and concurrence: 6 months, 0.4 FTE
- OFR review/OMB review/publish rulemaking: 9 months, 0 FTE
- Public comment period: 3 months, 0 FTE
- Address public comments: 6 months, 0.4 FTE
- Revise rulemaking 2 month, 0.2 FTE
- Engage internal stakeholders: 2 month, 0.2 FTE
- Finalize rulemaking and concurrence: 6 months, 0.2 FTE
- OFR review/OMB review/publish rulemaking: 9 months, 0 FTE

- Total: 8 years, 3.2 FTE, (~$800,000)
- Industry: Averted cost of $750,000 per year based on no longer having to accept conditions from the current process of 50.55a rulemakings.
- NRC: Averted cost of 2 FTE per year from no longer publishing ASME rules as is the current approach, ~$400,000 in savings per year

Idea: Relocate the Text of 10 CFR 50.55a into a Regulatory Guide(s) and Incorporate the RG(s) into 50.55a
POC: Mekonen Bayssie/Kamal Manoly

Background:

- 50.55a is difficult to interpret, due to formatting and complicated descriptions of conditions, requesting relief, augmented inspection programs, ISI program updates, and other topics.
- The regulatory guide(s) can provide significantly improved clarity and readability of 50.55a, which would benefit all stakeholders. An example of the improved readability of the CFR can be found on the NRC's web site .
- If desired, the text of the current CFR could be re-organized to improve understanding.

Analysis:

- Scope:
  - No change to existing regulatory practice.
- Regulatory impacts:
  - No regulatory impacts are expected related to this idea.
- Impact on external stakeholders:
  - External stakeholders would benefit from improved clarity of regulation from the reorganization.
  - Licensee concerns about rewriting implementing procedures since they reference the current paragraphs of the CFR.
  - CFR presumes that agencies will provide the text in the Federal Register vice IBR. NRC would need to establish that the current 34 pages in the CFR are sufficiently difficult to read that they inhibit efficient regulation.
- Potential for unintended consequences:
  - Low
- Resource impacts:
  - Low initial resource costs to engage internal and external stakeholders
  - High initial resource costs to relocate the text into a RG(s). Moderate resource costs if desired to reorganize the text
  - Moderate burden increase for licensees for procedure development.
- Relevant stakeholders:
  - NRC technical staff involved in ASME Code activities and Code-related licensing actions.
  - ASME
  - U.S. license-holders
  - Office of the Federal Register (OFR)
  - Public interest groups

Resource Estimates:

- New effort for NRC staff that facilitates to write and organize for clarity of 50.55a
- Does not impact 50.55a rulemaking effort
- Additional burden on NRC, and on licensees for procedure development, so costs incurred must be justified relative to the benefit of having to relocate the text into a RG(s)

- **Initial costs**
  - Initial effort by SMEs to relocate the text into a RG(s) and reorganize text refined the guidance to be more readable: 6 months, 3 FTE
  - Engage external stakeholders: 6 month, 0.5 FTE
  - Finalize document and concurrence: 4 months 0.5 FTE
  - IBR processing rulemaking 0.5 FTE
  - Total: 2 years 4.6 FTE (~$1.2 million)
  - Benefits: The staff will likely not also work on ASME rulemakings during this time, which would normally save ~2 FTE per year. However, the number of relief requests would rise each year, offsetting this benefit. Assume 1 FTE per year in overall savings, 2 FTE over 2 years, ~$400,000.
- **Long-term costs**
  - Once text reallocated in to the RGs, RGs are updated by NRC RG review process when 50.55a updated
  - Review of changes to 50.55a: 1 month, 0.1 FTE
  - Revise RGs to reflect changes in ASME code: 2 months, 1.5 FTE
  - Engage internal stakeholders: 1 month, 0.25 FTE
  - Engage external stakeholders (public comment): 1 month, 0.25 FTE
  - Finalize document and concurrence: 1 month, 0.1 FTE
  - IBR rulemaking processing 0.5 FTE
  - Total: 2.7 FTE over 2 years
  - Benefits: There will be some efficiencies incorporating RGs by reference instead of the current text of 50.55a. The current process is approximately 2 FTE per year, therefore assume a savings of approximately 0.5 FTE per year (~$100,000)

Idea: Revisiting the Need to Mandate Codes and Standards by Removing Section III, XI and OM Codes from 50.55a Entirely
POC: Kamal Manoly/John Honcharik

Background:

- 50.55a is difficult to interpret, due to formatting and complicated descriptions of conditions, requesting relief, augmented inspection programs, ISI program updates, and other topics.
- Removing the ASME standards from the rule mitigates these issues and reduces burden and costs in the long run.
- Section III (Division 1), XI and O&M, including their associated code cases, can each be endorsed in separate regulatory guides to be developed and updated every two years.
- This practice is consistent with NRC endorsement of Section III, Division 2 for concrete containments in RG 1.136.

Analysis:

- Scope:
  - Major upheaval of current practice.
  - Spans multiple NRC Offices
  - Impacts multiple external stakeholders
  - Replace 50.55a with a general requirement to adopt a standard or rely on separate regulatory requirements.
- Regulatory impacts:
  - Loss of authority to enforce ASME rules for design, in-service inspection, and in-service testing.
  - Possible development/use of inconsistent standards by licensees.
  - Very uncertain outcomes in the near and medium timeframe.
- Impact on internal stakeholders:
  - Staff concerns about lack of reasonable assurance of adequate protection.
  - Significant retraining and uncertainty.
  - Potential for inconsistent application of requirements relating to standards.
- Impact on external stakeholders:
  - ASME concerns about loss of status of their standards.
  - Licensee concerns about rewriting in-service inspection plans.
  - General public concerns about major relaxation of long-standing, successful regulatory practice.
- Potential for unintended consequences:
  - High – Although some portions of the standards are the only currently viable standards, for example Section III, Division 1, for design of nuclear components.
- Resource impacts:
  - High initial resource costs to engage internal and external stakeholders.
  - Potential subject of litigation.
  - High retraining and policy development costs.
  - High resource savings in the long term.
  - High burden reduction for licensees in the long term.
- Relevant stakeholders:
  - NRC technical staff involved in ASME Code activities and Code-related licensing actions.

- NRC technical staff involved with approving IEEE standards
- ASME
- U.S. license-holders
- Public interest groups

Resource Estimate:

- **Initial costs and benefits for removing Sections III, XI and OM**
  - Initial effort by SMEs to relocate the text into a RG(s) and reorganize text refined the guidance to be more readable: 6 months, 2 FTE
  - Engage external stakeholders: 6 months, 1.6 FTE
  - Finalize document and concurrence: 4 months, 0.5 FTE
  - Total cost: 2 years 4.1 FTE (this does not address case-by-case review of new codes (which would require extensive review time to familiarize with new codes, and what would be an acceptable level of safety), and changing regulations to performance based (see Change Regulation to Performance based sheet)
  - Initial benefit: 2 FTE per year across 2 years that would have otherwise been spent on an ASME rulemaking, offset by an increase in relief requests due to not approving new ASME standards. Overall benefit, assume 1 FTE per year
  - Net: 2 years, 2.1 FTE (~$500,000)
- **Long-term costs and benefits**
  - Once text reallocated in to the RGs, RGs are updated by NRC RG review process when 50.55a updated
  - Review of changes to 50.55a: 1 month, 0.1 FTE
  - Revise RGs to reflect changes in ASME code: 2 months, 1.5 FTE
  - Engage internal stakeholders: 1 month, 0.25 FTE
  - Engage external stakeholders (public comment): 1 month, 0.25 FTE
  - Finalize document and concurrence: 1 month, 0.1 FTE
  - Total cost: 2.2 FTE every 2 years
  - Benefit: 4 FTE every 2 years otherwise spent on ASME rulemaking
  - Net: savings of 1.8 FTE (~$400,000) every 2 years
- **Initial costs and benefits for removing Section III only**
  - Initial effort by SMEs to relocate the text into a RG(s) and reorganize text refined the guidance to be more readable: 6 months, 1 FTE
  - Engage external stakeholders: 6 month, 1 FTE
  - Finalize document and concurrence: 4 months, 0.5 FTE
  - Total cost: 2 years 2.5 FTE (this does not address case-by-case review of new codes (which would require extensive review time to familiarize with new codes, and what would be an acceptable level of safety), and changing regulations to performance based (see Change Regulation to Performance based sheet)
  - Benefit: 1.5 FTE over 2 years otherwise spent on ASME rulemaking
  - Net: 1 FTE (~$250,000) cost
- **Long-term costs and benefits for removing Section III only**
  - Once text reallocated in to the RGs, RGs are updated by NRC RG review process when 50.55a updated
  - Review of changes to 50.55a: 1 month, 0.1 FTE
  - Revise RGs to reflect changes in ASME code: 2 months, 0.5 FTE
  - Engage internal stakeholders: 1 month, 0.25 FTE
  - Engage external stakeholders (public comment): 1 month, 0.25 FTE
  - Finalize document and concurrence: 1 month, 0.1 FTE

- Total: 1.2 FTE every 2 years
- Benefit: 2 FTE every 2 years otherwise spent on ASME rulemaking
- Net: benefit of 0.8 FTE (~$150,000) every 2 years

Idea: Rewrite of 50.55a
POC: Michael Benson

Background:

- 50.55a is difficult to interpret, due to formatting and complicated descriptions of conditions, requesting relief, augmented inspection programs, ISI program updates, and other topics.
- Improving the clarity and readability of 50.55a would benefit all stakeholders.
- Rewrite could include creating new separate parts in the regulations for design, IST and ISI to improve the clarity.

Analysis:

- Scope:
  - Minor update to existing regulatory practice.
- Regulatory impacts:
  - No regulatory impacts are expected related to this idea.
- Impact on external stakeholders:
  - External stakeholders would benefit from improved clarity of regulation.
  - Licensee concerns about rewriting implementing procedures.
- Potential for unintended consequences:
  - Low
- Resource impacts:
  - Moderate initial resource costs to engage internal and external stakeholders
  - Moderate resource costs to develop new regulation.
  - Low burden increase for licensees for procedure development.
- Relevant stakeholders:
  - NRC technical staff involved in ASME Code activities and Code-related licensing actions.
  - ASME
  - U.S. license-holders
  - Public interest groups

Resource Estimates:

- Draft SECY paper to Commission: 12 months, 0.2 FTE
- Commission response: 12 months, 0 FTE
- Initial draft of 50.55a rewrite: 12 months, 0.4 FTE
- Engage internal stakeholders: 6 months, 0.2 FTE
- Engage external stakeholders: 6 months, 0.2 FTE
- Finalize rulemaking and concurrence: 6 months, 0.2 FTE
- OFR review/OMB review/publish rulemaking: 9 months, 0 FTE
- Public comment period: 3 months, 0 FTE
- Address public comments: 6 months, 0.2 FTE
- Revise rulemaking 2 month, 0.1 FTE
- Engage internal stakeholders: 2 month, 0.1 FTE
- Finalize rulemaking and concurrence: 6 months, 0.1 FTE

- OFR review/OMB review/publish rulemaking: 9 months, 0 FTE
- Total: 8 years, 1.7 FTE (~$400,000)