



RETROSPECTIVE REVIEW OF ADMINISTRATIVE REQUIREMENTS



Public Meeting
August 27, 2020

OPENING REMARKS



Why Are We Here?



Clarify NEI's comments¹ on the Retrospective Review of Administrative Requirements

Not requesting new inputs or comments

¹ NEI's comments on the NRC's Retrospective Review of Administrative Requirements [85 FR 6103; Docket ID NRC-2017-0214], dated May 6, 2020 (ADAMS Accession No. [ML20128J340](#)).

Background



NRC published *Federal Register* notice in February 2020 ([85 FR 6103](#)) with a 90-day public comment period.

- Requested input from the public on outdated or duplicative administrative requirements

Held public meetings to discuss the NRC's request

Received a combined total of 145 items for consideration

Discussion/Clarification



Table 3: Annual Reporting on Work Hours, Page 6 – Please clarify if NEI’s request is limited to reporting requirements in Part 26, Subpart I – Managing Fatigue (i.e., work hours), OR is the request broader, given the references to requirements only applicable to the reporting of FFD program information on drug and alcohol testing (Paul Harris/NRC)

Discussion/Clarification



Table 3: Annual Reporting on Work Hours, Page 6 – If the request also applies to the drug and alcohol testing information in annual FFD program performance reports submitted to the NRC under 26.417(b)(2) and 26.717(e), please clarify the basis to justify the elimination of these reports (Paul Harris/NRC)

Discussion/Clarification



Table 4: Prompt Notifications on Work Hours, Page 8 – Please clarify whether NEI’s request is limited to reporting requirements in Part 26, Subpart I – Managing Fatigue (i.e., work hours), OR is the request broader, given the references to requirements only applicable to the reporting of FFD program information on drug and alcohol testing. If NEI’s request is specific to Fatigue reporting requirements, please provide specific reference (Paul Harris/NRC)

Discussion/Clarification



Table 4: Prompt Notifications on Work Hours, Page 8 – If the request is specific to the 24-hour notifications to the NRC headquarters operation center on the following significant FFD policy violations and programmatic failures, please clarify the basis to justify the request to eliminate the reports and instead rely on the onsite resident inspector to review plant condition reports (Paul Harris/NRC)

Discussion/Clarification



Table 4: Prompt Notifications on Work Hours, Page 8 – Please describe the information evaluated to justify the statement “We have not found an example of the NRC taking immediate action, such as commencing a reactive inspection, based on the 24-hour notifications prescribed in Part 26” (Paul Harris/NRC)

Discussion/Clarification



Table 6: Duplication of Requirements in Part 50, Emergency Plan, and Reporting Rules, Page 13 – Clarify how licensees would ensure the records of event review will be retained for three years after issuing the LER (Caroline Tilton/NRC)

Discussion/Clarification



Table 6: Duplication of Requirements in Part 50, Emergency Plan, and Reporting Rules, Page 13 – Clarify which regulatory requirement is duplicative of 10 CFR 50.36a(a)(2) (Caroline Tilton/NRC)

Discussion/Clarification



Table 7: Reporting of Items Available in CAP or Site Records, Page 15 – Clarify what is meant by the comment to revise 10 CFR 55.46(d)(3) to maintain records as opposed to submitting a report. 10 CFR 55.46(d)(3) only requires that the records be made available to the NRC for review. (Theresa Buchanan/NRC)

Discussion/Clarification



Table 7: Reporting of Items Available in CAP or Site Records, Page 15 – Clarify how licensees would ensure the same level of quality and accuracy in the information requested if the requirement is changed from “submit a report” to “maintain as a record” (Caroline Tilton/NRC)

Discussion/Clarification



Table 8: Reporting of Effluent Data versus Retain in Records, Page 20 – Clarify how licensees would ensure the same level of quality and accuracy in the information requested if the requirement is changed from “submit a report” to “maintain as a record” (Caroline Tilton/NRC)

Discussion/Clarification



Table 9: Treatment of Current Licensing Basis Information, Page 22 – Clarify the term “no substantial decrease in effectiveness” in the recommendations for proposed changes (Andrea Keim/NRC)

Discussion/Clarification



Table 13: Reporting on Operator Licenses, Page 31 – Clarify requested changes to both 10 CFR 50.74 and 10 CFR 55.25, as applicable, as relates to the facility licensee submitting reports on any permanent disqualifying medical conditions for individual licensed operators (Theresa Buchanan/NRC)

Discussion/Clarification



Table 13: Reporting on Operator Licenses, Page 31 – Clarify the request to revise 10 CFR 55.25 such that the individual licensed operator is no longer required to report the disqualifying medical condition directly to the NRC (Theresa Buchanan/NRC)

Discussion/Clarification



Table 17: Letters Approving Proprietary Withholdings, Page 39 – Clarify what NEI meant by the term “official record” in the rationale for the proposed change. NRC confirmation letters are put into ADAMS and sent to licensees but are not considered "official records" for licensee records management purposes (Christina England/NRC)

Have Questions?

Please contact:

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How Did We Do?



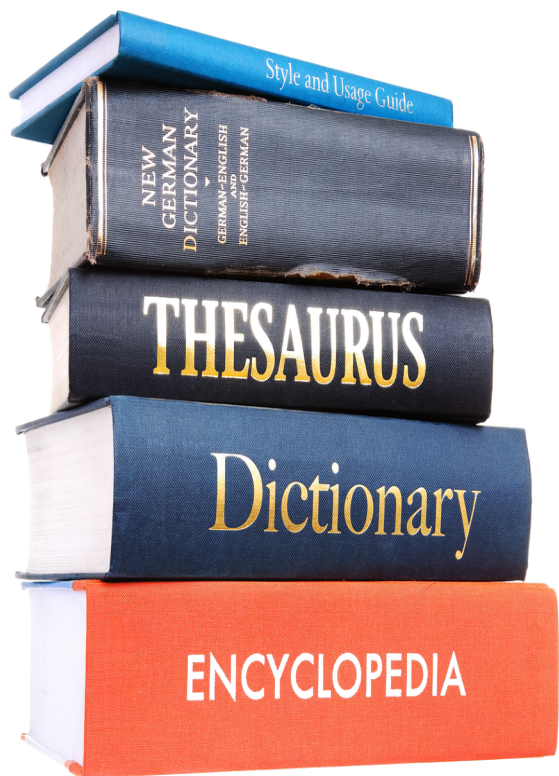
There are several ways you can provide your feedback on this meeting:

- Scan QR code for NRC Public Meeting Feedback Form (meeting ID# 20200995); or
- Go to the [Public Meeting Schedule](#) and click on the “Meeting Feedback” link.

CLOSING REMARKS



Acronym/Abbreviation



ADAMS - Agencywide Documents
Access and Management System

CAP – Corrective Action Process

CFR – *Code of Federal Regulations*

FFD – Fitness For Duty

LER – Licensee Event Report

NEI – Nuclear Energy Institute

NRC – Nuclear Regulatory Commission