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## POLICY ISSUE (Notation Vote)

December 20, 2021

SECY-21-0110

FOR: The Commissioners

FROM: Daniel H. Dorman  
Executive Director for Operations

SUBJECT: RULEMAKING PLANS TO IMPLEMENT THE RESULTS OF THE  
RETROSPECTIVE REVIEW OF ADMINISTRATIVE REQUIREMENTS  
EVALUATION

PURPOSE:

The purpose of this paper is to request Commission approval to initiate rulemaking resulting from the staff's evaluation of the U.S. Nuclear Regulatory Commission's (NRC) Retrospective Review of Administrative Requirements (RROAR). The rulemaking would amend administrative requirements in Title 10 of the *Code of Federal Regulations* (10 CFR) to make information submission, recordkeeping, and reporting processes more efficient and reduce regulatory burden for the NRC, applicants, and regulated entities, without an adverse impact on the NRC's mission. Enclosures 1 and 2 are the rulemaking plans for Commission review. Enclosure 1 supports staff's recommended rulemaking alternative, Alternative 5. Together, Enclosures 1 and 2 support the other rulemaking alternatives discussed in this paper. Enclosure 2, Rulemaking Plan 2, was prepared in support of Alternatives 2, 3, and 4.

SUMMARY:

The staff evaluated the recommendations resulting from RROAR and determined that 43 items could be addressed through rulemaking. The staff recommends conducting a rulemaking to amend several identified administrative requirements in 10 CFR (Rule 1). The goal of the rulemaking is to implement stakeholder-recommended changes to the CFR that reduce reporting burdens, while preserving the capability to meet the NRC's mission.

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Enclosure 3 transmitted herewith contains  
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The rulemaking would implement regulatory changes that are administrative in nature and that the staff anticipates will have broad stakeholder support and no policy implications. Because of the nature of the rule, the staff is recommending use of a streamlined process for notice and comment rulemaking, which would not include the development of a regulatory basis. The staff is also recommending that the Commission delegate signature authority to the Executive Director for Operations (EDO) for the rulemaking.

A second rulemaking (Rule 2) could be conducted regarding the changes that would, therefore, benefit from the standard process for notice and comment rulemaking, including the development of a regulatory basis that would be issued for public comment. This step would afford preliminary stakeholder engagement and provide the staff an opportunity to consider the comments received on the regulatory basis.

This paper provides alternative approaches for implementing the identified changes to administrative requirements, but after staff's review of risk, benefits, and resource considerations, the staff is recommending conducting only Rule 1 (discussed in Enclosure 1).

#### BACKGROUND:

The NRC conducted an evaluation to identify outdated or duplicative administrative requirements in 10 CFR that may be eliminated or modified through the rulemaking process without an adverse effect on public health or safety, the common defense and security, protection of the environment, or regulatory effectiveness. On February 4, 2020, the staff published a 60-day notice in the *Federal Register* (85 FR 6103) requesting input from its licensees and members of the public on any administrative requirements that may be outdated or duplicative in nature. The NRC received a total of over 146 comment submissions with 100 unique recommendations for changes, spanning the agency's program areas. The staff evaluated the comments by applying criteria approved by the Commission in the staff requirements memorandum (SRM) to COMSECY-18-0027, "Staff Requirements—COMSECY-18-0027—Evaluation Criteria for Retrospective Review of Administrative Regulations," dated October 8, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19281C697). The evaluation identified changes to administrative requirements that would make information submission, recordkeeping, and reporting processes more efficient and potentially reduce the regulatory burden on the NRC, applicants, and regulated entities.

The staff summarized the evaluation in SECY-21-0056, "Evaluation of Stakeholder Input on Retrospective Review of Administrative Requirements," dated June 1, 2021 (ADAMS Package Accession No. ML21013A026). As shown in Enclosure 1 to the Commission paper, 54 of the 100 unique comments were screened into the rulemaking process, while 46 comments<sup>1</sup> did not meet the Commission-approved criteria.

On June 30, 2021, the staff held an informational public meeting to discuss the results of the NRC's RROAR. The purpose of the public meeting was to explain the staff's approach for evaluating RROAR comments, as documented in SECY-21-0056, and answer stakeholder

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<sup>1</sup> The staff provided two comments to the agency's innovation and transformation efforts team for consideration outside rulemaking, as directed by the Commission in SRM-SECY-17-0119, "Staff Requirements—SECY-17-0119—Retrospective Review of Administrative Regulations," dated April 5, 2018 (ADAMS Accession No. ML18096A500).

questions on the results of the evaluation. The meeting was attended by approximately 100 individuals representing the Nuclear Energy Institute (NEI), several nuclear power utilities, Senate committee staff, members of the public, and the NRC staff. The discussion included requests for immediate interim relief for regulations recommended for rulemaking, acceleration of the rulemaking process, potential development of an informational web page. In addition, the staff communicated its plans for a future public meeting to discuss in greater detail the staff's comment evaluation process for the RROAR effort.<sup>2</sup>

On August 19, 2021, the staff held a follow-up meeting with the public to further discuss the results of RROAR. The meeting was attended by approximately 50 individuals representing the NEI, nuclear power utilities, Senate committee staff, members of the public, and the NRC staff. The meeting discussion focused on the questions that were submitted prior to the public meeting, and the NRC staff provided insights on the topics where possible. For each topic, the NRC staff and stakeholders discussed how the NRC uses the reports in question to achieve its mission, including transparency with the public, and the NRC staff elaborated on why the reports continue to be necessary.<sup>3</sup>

On September 8, 2021, NEI sent a letter (ADAMS Accession No. ML21256A149) to NRC's EDO, stating that they did not see the value of continuing to spend significant resources on this effort. The staff added NEI's letter to the rulemaking docket file as a late-filed comment. The staff notes that they communicated their assessment of all RROAR comments in SECY 21-0056 and in the public meetings held on June 30, 2021, and August 19, 2021. The staff applied the Commission-approved comment screening criteria and balanced potential burden reductions with the Principles of Good Regulation and the NRC's safety and security mission. The screening process resulted in 54 comments being screened in for potential future rulemaking. The comments that were not considered within the scope of potential future rulemaking activities were appropriately screened out by this process.

#### DISCUSSION:

Of the 54 comments that have been screened into the rulemaking process, 10 comments were either incorporated in an administrative corrections rulemaking or are being evaluated in ongoing rulemaking activities apart from the revision of administrative requirements rulemakings. The staff has sorted the 44 comments into two broad categories of changes: those that are more administrative in nature (21 comments) and those requiring additional justification and stakeholder outreach (23 comments). During the rulemaking plan development process, the staff also identified six necessary conforming changes and added these changes to the scope of the revision of administrative requirements rulemaking (four addressed in Rule 1 and two addressed in Rule 2). In developing rulemaking plans to implement these changes, the staff applied the new [rulemaking decision guidance tool](#) and [rulemaking approach tool](#) (ADAMS Accession Nos. ML20266G457 and ML20266G456, respectively) to identify the most effective and efficient approach to addressing rulemaking needs. The staff applied the concepts of the agency's Be riskSMART decision-making framework. Additionally, the staff applied improvements identified from the Process Simplification Transformation Initiative, such as the use of modern information technology in the document development and concurrence processes. The staff considered whether a regulatory basis would be needed to support the regulatory changes and whether an alternate rulemaking process would be appropriate (e.g.,

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<sup>2</sup> The meeting materials and summary are in ADAMS Package Accession No. ML21142A003.

<sup>3</sup> The meeting materials and summary are in ADAMS Package Accession No. ML21208A416.

reduced concurrence scope depending on the extent of new information contained in rulemaking documents) to gain efficiency in the rulemaking schedule. The staff also considered whether the RROAR comments could be addressed using non-rulemaking approaches, either as a permanent measure (e.g., guidance changes) or an interim measure pending rulemaking (e.g., use of enforcement discretion or use of licensee-specific exemptions). Implementation of these changes requires changes to rule text. Therefore, changes to guidance are not a viable option. The staff concluded that using the rulemaking process alone, instead of interim measures in combination with rulemaking, provides greater transparency with members of the public, improves the coherence of regulatory reporting requirements, and is a more efficient use of staff resources. Therefore, the staff is not pursuing non-rulemaking alternatives to address RROAR comments at this time.

#### Rule 1 (Enclosure 1)

Rule 1 are those that the staff anticipates will have broad stakeholder support, have no policy implications, and are administrative in nature. The staff considered using the direct final rule (DFR) process to implement the changes, but after careful analysis, the staff determined that using the DFR process for rulemaking would involve information collection clearance changes. The Office of Management and Budget's current process for information collection changes in a DFR requires the publication of an information collections *Federal Register* notice with a 60-day comment period that must end prior to the publication of the DFR and the companion proposed rule. To provide the public with sufficient information to properly assess the information collection changes, the draft rule language must be sufficiently mature to be included in the draft information collections supporting statement to justify the information collection changes. The *Federal Register* notice only requests comments on the information collections and not the rule language. From an information collections perspective, the process after publication of the DFR and the companion proposed rule is the same as for a notice and comment rule. As such, using the DFR approach may not simplify the process as intended. However, the use of a streamlined notice and comment rulemaking process (i.e., issuance of a proposed rule for comment, not preparing a regulatory basis, and requesting Commission delegation of signature authority to the EDO) would expedite the rulemaking while addressing the challenges associated with a DFR. The staff recommends implementing these changes as explained in Rulemaking Plan 1 (Enclosure 1).

The NRC would conduct this rulemaking using a streamlined process for notice and comment rulemaking (i.e., with no pre-rulemaking activity or regulatory basis). The amendments proposed in Rule 1 would make six changes to the reporting requirements and forms:

- (1) Modify the requirements relating to the submittal timeframe for follow-up reports from 30 days to 60 days to simplify licensees' management of the production of these reports to a common timeline.
- (2) Eliminate the requirement to submit to the NRC an annual inventory reconciliation report, because the requirement is no longer needed. The information is now required by the National Source Tracking System that did not exist when the NRC issued the mandate.
- (3) Eliminate and modify requirements relating to updated final safety analysis reports to allow flexibilities in the paper page replacement process.
- (4) Modify requirements relating to the use of official NRC Form 540, "Uniform Low-Level Radioactive Waste Manifest Shipping Paper"; Form 541, "Uniform Low-Level

Radioactive Waste Manifest Container and Waste Description”; and Form 542, “Uniform Low-Level Radioactive Waste Manifest Index and Regional Compact Tabulation,” to allow licensees the flexibility to provide and maintain the information in a format other than NRC Forms 540, 541, and 542.

- (5) Modify requirements relating to written communications to streamline the document submittal process for NRC licensees and the NRC.
- (6) Modify requirements relating to the submittal frequency of financial reports for combined license holders before decommissioning. The agency could make the requirements less burdensome by eliminating reporting 2 years before initial fuel load.

These regulatory changes have no policy implications and are administrative in nature; accordingly, the staff recommends the Commission delegate signature authority for Rule 1 to the EDO to further accelerate the rulemaking process.

#### Rule 2 (Enclosure 2)

The staff also evaluated a second rulemaking (Enclosure 2) to explore the feasibility of implementing the regulatory changes proposed by stakeholders that would benefit from the standard process for notice and comment rulemaking. The scope of the rulemaking for Rule 2 would include evaluating the administrative regulations with respect to whether the current timeframe and frequency of reports are adequate. Staff would determine whether the current timeframes and frequency of reports could be relaxed to reduce the burden on licensees, while maintaining the necessary regulatory oversight to ensure the regulations provide reasonable assurance of adequate protection. These include six changes:

- (1) Modify the reporting frequency or eliminate duplicative requirements relating to radiological effluent reports.
- (2) Modify the reporting frequency, report submittal timing, specific event reporting requirements, and submittal of supplemental information for requirements relating to licensing-basis reports and changes, tests, and experiments related to the final safety analysis report (10 CFR 50.59(d)(2) and 10 CFR 72.48(d)(2)).
- (3) Modify the report submittal timing for requirements relating to emergency preparedness plan changes.
- (4) Modify the report submittal timing for requirements relating to security plan and material control and accounting program changes.
- (5) Modify the reporting requirements and potentially narrow the reportability criteria with respect to “supervisory personnel” to those individuals who perform activities that a risk-informed evaluation process has shown to be significant to public health and safety for requirements relating to fitness-for-duty reports.
- (6) Modify duplicative requirements relating to technical specifications reports.

These regulatory changes would benefit from having more robust stakeholder engagement and from consideration of comments that may be received on a regulatory basis; accordingly, Rule 2

would follow the standard process for notice and comment rulemaking. The staff would develop a regulatory basis for public comment before issuing the proposed rule.

#### RULEMAKING ALTERNATIVES:

The staff weighed the five rulemaking alternatives below and considered schedule, availability of resources, and project complexity.

#### **Alternative 1: No Action (Status Quo)**

The NRC would not make any revisions to administrative requirements in 10 CFR. Under Alternative 1, the staff would cease all activities related to RROAR rulemakings.

##### Pros:

- The NRC would expend no further resources on rulemaking.

##### Cons:

- The potential efficiencies and burden reductions identified from the RROAR evaluation would not be realized.

#### **Alternative 2: Issue a Single Comprehensive Rulemaking**

The NRC would conduct one comprehensive rulemaking that follows the standard process for notice and comment rulemaking.

##### Pros:

- Costs for implementing the rulemaking would be lower than the costs for conducting multiple rulemakings because of the administrative costs associated with preparing, publishing, and issuing each rule separately.
- All of the potential benefits from the rule could be realized in approximately 48 months, which is similar to the timeframe proposed in Alternative 3 but sooner than the timeframe proposed in Alternative 4.
- Coordination between multiple rulemakings amending the same parts of the regulations would be eliminated.

##### Cons:

- It would take longer to realize the potential benefits resulting from the regulatory changes in Rule 1.
- Staff resources to support this medium-priority rulemaking are limited due to higher priority work. This may require contracting resources to support the technical staff or extending the schedule until staff resources are available, or both.

#### **Alternative 3: Issue Two Parallel Rulemakings**

The NRC would conduct one rulemaking that follows the streamlined process for notice and comment rulemaking for Rule 1 in parallel with one rulemaking that follows the standard process for notice and comment rulemaking with an associated regulatory basis for Rule 2.

Pros:

- Focuses resources on achieving tangible progress as quickly as possible (i.e., the reduction of regulatory burden).
- Potential benefits could be realized in approximately 22 months through the streamlined rulemaking process for the changes in Rule 1, while the full benefits of both rulemakings could be realized in approximately 48 months. This timeframe allows for benefits from Rule 1 to be realized faster than Alternative 2 and allows for the benefits from Rule 2 to be realized faster than Alternative 4.

Cons:

- The cost of implementing the two rulemakings would be more than the cost of conducting a single comprehensive rulemaking (Alternative 2) because of the additional administrative costs required to prepare, publish, and issue a rule.
- Staff resources to support two medium-priority rulemakings are limited due to higher priority work. This alternative may require contracting resources to support the technical staff or extending the schedule until staff resources are available, or both.
- Due to limited staff for the information collection program and other ongoing information collection activities at the agency, the program staff may not be able to support the rulemaking schedule in parallel with information collection activities. The information collection program staff cannot be supplemented with contractor staff.

**Alternative 4: Issue Two Sequential Rulemakings**

The staff would conduct one rulemaking that follows a streamlined process for a notice and comment rulemaking for Rule 1 followed by a rulemaking that follows the standard process for notice and comment rulemaking with the associated regulatory basis for less Rule 2. Based on the availability of resources, work on Rule 2 would start as soon as possible following the completion of Rule 1, but no later than 6 months after the publication of the final rule.

Pros:

- Optimizes resources to achieve tangible progress as quickly as possible (i.e., the reduction of regulatory burden) while maintaining a workload that is manageable with current staff resources.
- Efficiencies would be gained, and burdens reduced by regulatory changes in Rule 1 in approximately 22 months through the streamlined process for notice and comment rulemaking. This timeframe is faster than Alternative 2.

- Unlike under Alternatives 2 and 3, the agency would not need to leverage contractor resources to support the technical staff.

Cons:

- Unlike under Alternatives 2 and 3, benefits from the changes in Rule 2 would not be realized for approximately 70 months after the initiation of Rule 1 (approximately 22 months for Rule 1 and then 48 months for Rule 2).

**Alternative 5: Issue One Rulemaking for Changes Within the Scope of Rule 1 Only**

The staff would conduct one rulemaking that follows a streamlined process for a notice and comment rulemaking for Rule 1 but would not pursue a rulemaking for Rule 2.

Pros:

- Optimizes resources to achieve tangible progress as quickly as possible (i.e., the reduction of regulatory burden) while maintaining a workload that is manageable with current staff resources.
- Efficiencies would be gained, and burdens reduced by regulatory changes in Rule 1 in approximately 22 months through the streamlined process for notice and comment rulemaking.
- Unlike under Alternatives 2 and 3, the agency would not need to leverage contractor resources to support the technical staff.
- Unlike under Alternatives 2, 3, and 4, the NRC would avoid spending resources developing a regulatory basis for Rule 2 that could ultimately result in a finding that the rule is not cost-beneficial.

Cons:

- Any potential benefits of the amendments within the scope of Rule 2 would not be realized.

The staff recommends rulemaking Alternative 5 because this alternative (1) results in early rulemaking benefits, (2) provides for rulemaking support organizations to staff the rulemakings, (3) simplifies rulemaking project management by only performing Rule 1, and (4) avoids the possibility of expending agency resources on the development of a regulatory basis that determines Rule 2 would not be cost-beneficial. This alternative would also demonstrate that the agency implements the Be riskSMART decision-making framework and Process Simplification Transformation Initiative. The staff considered rulemaking Alternative 4 but determined the resources needed to fully implement Alternative 4 may not be warranted in light of the potential net benefits.

Enclosures 1 and 2 provide the rulemaking plans to support the alternatives discussed in the paper. Enclosure 1 supports the recommended alternative. Enclosure 2 is provided as it supports Alternatives 2, 3, and 4. If the Commission approves initiation of rulemaking, the staff will develop a more detailed analysis of costs and benefits as part of the proposed rule. If the

staff determines at any point that the costs associated with rulemaking are not justified by the benefits, or that the rulemakings would adversely impact the NRC's programmatic needs, regulatory efficiency, or transparency, the staff will propose discontinuation of the rulemaking and notify the Commission through a Note to Commissioners' Assistants. The staff would follow the process for discontinuing rulemakings and spend no further resources allocated for the rulemaking.

In a separate effort, NEI submitted a petition for rulemaking in 2018, docketed as PRM-50-116, requesting elimination of nonemergency notifications in 10 CFR 50.72, "Immediate notification requirements for operating nuclear power reactors," which is a topic also covered in RROAR. On November 30, 2020, in SECY-20-0109, "Petition for Rulemaking and Rulemaking Plan on Immediate Notification Requirements for Nonemergency Events (PRM-50-116; NRC-2018-0201)" (ADAMS Package Accession No. ML20073G004), the staff submitted the petition closure package to the Commission for review and approval, recommending consideration of PRM-50-116 in the rulemaking process. On July 28, 2021, in SRM-SECY-20-0109 (ADAMS Accession No. ML21209A947), the Commission approved the staff's recommendation to initiate a rulemaking to evaluate the immediate notification requirements for nonemergency events in 10 CFR 50.72 and the closure of the docket for PRM-50-116. The Commission also directed that the staff should not pursue changes that shift the burden for gathering, verifying, and communicating information on nonemergency events from licensees to resident inspectors. Staff has maintained close coordination between the revision of administrative requirements rulemaking and the PRM 50-116 activities in order to ensure consistency and share lessons learned. If the Commission approves the rulemaking proposed in this paper, the staff will continue to share lessons learned from this rulemaking with the 10 CFR 50.72 rulemaking activity.

#### Description of Rulemakings: Estimate of Costs and Benefits

Enclosure 3 estimates the resources needed to implement the rulemaking alternatives presented in this paper.

Alternative 1 would result in no costs or benefits.

Alternative 2 would require additional staff or contractor resources to complete the single comprehensive rulemaking. This alternative would also take longer (48 months) than Alternatives 3 and 4 (22 months) to realize benefits from the changes in Rule 1.

Alternative 3 would require additional staff or contractor resources to complete two rulemakings in parallel. However, this alternative would realize benefits from the changes in Rule 1 in 22 months—26 months earlier than Alternative 2—and would realize benefits from the changes in Rule 2 up to 48 months earlier than under Alternative 4.

Alternative 4 would not require additional contractor resources to complete two rulemakings sequentially. This alternative would result in benefits from the changes in Rule 1 in 22 months and would realize benefits from the changes in Rule 2 up to 48 months after completion of Rule 1.

Alternative 5 would not require additional staff or contractor resources and would realize benefits from the changes in 22 months in Rule 1. However, because this alternative would only pursue rulemaking for items within the scope of Rule 1, the potential regulatory benefits (e.g., burden reduction) of items within the scope of Rule 2 would not be realized.

COMMITMENT:

If the Commission approves initiation of the rulemakings in accordance with SECY-16-0042, "Recommended Improvements for Rulemaking Tracking and Reporting," dated April 4, 2016 (ADAMS Package Accession No. ML16075A066), the staff will add the rulemaking activities described in Enclosure 1 to the agency's list of funded rules at the next appropriate budget cycle.

RECOMMENDATIONS:

The staff recommends that the Commission take the following actions:

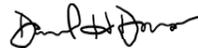
- Approve Alternative 5 to initiate rulemaking to amend administrative requirements in 10 CFR as described in Enclosure 1.
- Delegate signature authority for the rulemaking to the EDO to further accelerate the rulemaking process.
- Approve the staff's recommendations on reviews by the Advisory Committee on Reactor Safeguards, the Committee to Review Generic Requirements, and the Advisory Committee on the Medical Use of Isotopes, as described in Enclosure 1.

RESOURCES:

Enclosure 3 includes estimates of the resources needed to complete Alternatives 2, 3, 4, and 5. Resource estimates in Enclosure 3 are not publicly available.

COORDINATION:

The Office of the General Counsel has no legal objection to this SECY paper and rulemaking package. The Office of the Chief Financial Officer reviewed this package and has no concerns with the estimated resources in Enclosure 3.



Signed by Dorman, Dan  
on 12/20/21

Daniel H. Dorman  
Executive Director  
for Operations

Enclosures:

1. Proposed Rulemaking on Revision of Administrative Requirements Rulemaking Plan 1
2. Proposed Rulemaking on Revision of Administrative Requirements Rulemaking Plan 2
3. Resources (Not Publicly Available)

SUBJECT: RULEMAKING PLANS ON THE RESULTS OF THE RETROSPECTIVE  
REVIEW OF ADMINISTRATIVE REQUIREMENTS EVALUATION  
DATED: December 20, 2021

**ADAMS Accession Nos.: ML21124A116 (SECY paper); ML21124A053 (pkg.) SECY-21-0056-1**

OFFICE	NMSS/REFS/RRPB	NMSS/REFS/MRPB	NMSS/REFS/MRPB	NMSS/REFS/RRPB	NMSS/REFS/RASB
NAME	ACarrera	LRonewicz	JShepherd	IBerrios (w/edits)	CBladey (w/edits)
DATE	7/01/2021	7/01/2021	7/15/2021	7/07/2021	7/15/2021
OFFICE	NMSS/REFS/D	NMSS/MSST/D	NMSS/DFM/D	NMSS/DUWP/D	NRR/DRO/D
NAME	JTappert (w/edits)	KWilliams (TClark for w/edits)	SHelton (w/edits)	THolahan	CMiller (KMorgan- Butler for w/edits)
DATE	7/27/2021	7/30/2021	8/12/2021	8/03/2021	8/12/2021
OFFICE	NRR/DORL/D	NRR/DSS/D	NSIR/DPR/D	RES/DSA	NSIR/DPCP/D
NAME	BPham	JDonoghue (MJRoss Lee for)	KBrock	KWebber (TLaLain)	SAtack (w/edits)
DATE	8/09/2021	8/09/2021	8/11/2021	8/04/2021	7/30/2021
OFFICE	OCIO/GEMD	OCFO/DOB	QTE Resource	OGC – NLO	NMSS/D
NAME	DCullison	RAllwein	JDougherty (w/edits)	TJones	JLubinski
DATE	8/12/2021	8/16/2021	8/19/2021	11/10/2021	10/25/2021
OFFICE	NRR/D	NSIR/D	REFS/D	DEDM	EDO
NAME	AVeil (MKing for)	MGavrilas	RFurstenau (SCoffin for)	CHaney	DDorman
DATE	10/28/2021	10/26/2021	10/28/2021	12/ 14 /2021	12/ 20 /2021

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