

March 12, 2013

MEMORANDUM TO: R. W. Borchardt  
Executive Director for Operations

FROM: Annette L. Vietti-Cook, Secretary */RA/*

SUBJECT: STAFF REQUIREMENTS – SECY-12-0137 – IMPLEMENTATION  
OF THE CUMULATIVE EFFECTS OF REGULATION PROCESS  
CHANGES

The Commission has approved the staff's proposed actions to implement the cumulative effects of regulation (CER) process enhancements as described in SECY-12-0137, subject to the comments below.

Any expansion of the consideration of the CER should be considered in the broader context of actions directed from COMGEA-12-0001/COMWDM-12-0002, "Proposed Initiative to Improve Nuclear Safety and Regulatory Efficiency."

The staff should continue to develop and implement outreach tools that will allow NRC to consider more completely the overall impacts of multiple rules, orders, generic communications, advisories, and other regulatory actions on licensees and their ability to focus effectively on items of greatest safety import.

The staff should ensure that the development of any template is done with input from both reactor and non-reactor licensees. Additionally, the staff should encourage Agreement State engagement in the development of the template, to the extent there is interest.

The staff should gather input from all interested external parties on the effectiveness of NRC's CER process and provide an implementation status report to the Commission, including any recommendations for improvements derived from lessons learned, within 2 years of the date of this SRM.

As part of routine interactions, the staff should engage with Agreement States, broadly, on the cumulative effects of NRC's regulatory actions on the conduct of their Agreement State programs.

The staff should engage industry to seek volunteer facilities to perform "case studies" to review the accuracy of cost and schedule estimates used in NRC's regulatory analysis (such as the 10 CFR Part 73 security upgrades required after the attacks of September 11, 2001 and 10 CFR 50.48c, NFPA 805 program). Within 3 months of this SRM, the staff should provide via a Commissioners' Assistants Note a status update on its efforts to obtain volunteer facilities.

NRC senior management should carefully monitor the CER approach to ensure that no significant unintended consequences occur.

cc: Chairman Macfarlane  
Commissioner Svinicki  
Commissioner Apostolakis  
Commissioner Magwood  
Commissioner Ostendorff  
OGC  
CFO  
OCA  
OPA  
Office Directors, Regions, ACRS, ASLBP (via E-Mail)  
PDR