

# Cumulative Impact of Industry and NRC Actions

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# Cumulative Impact of Industry and Regulatory Actions

- Highest 2013 priority for Chief Nuclear Officers
- Ensure the focus of regulatory and industry actions is consistent with safety significance, the protection and reliability of critical equipment and the protection of the environment

# Cumulative Impact of Industry and Regulatory Actions

- Since 2005 substantial expansion in regulatory and industry workload
  - *Power reactors & fuel cycle facilities*
- Regulatory interactions – 2010 – Interrupted by Fukushima accidents – Restarted in 2012
- Need to ensure management and resources remain focused on safety and reliability
  - Prioritization and scheduling of industry-initiated and regulatory actions based on safety significance

# Industry Actions

- INPO -- senior executives (operations) reviewing work processes
- Initial recommendations included candidate areas for action
  - Corrective action
  - Human performance
  - Work management
- Understanding the focus of supervisors and managers workloads and oversight functions

# Phased Approach for Regulatory Actions

- Start with power reactors
  - Fuel cycle facilities to build on power reactor experiences using fuel cycle facility-specific processes
- Issue assessment and prioritization
- Risk-informed plant/site scheduling of industry and regulatory actions based on safety significance

# Proposed Approach

- Improve issue/problem definition and reach a common understanding on success pathways
- Improve regulatory analysis process
- Use existing information, PRA/ISA methods and risk-insights to assess, prioritize and justify regulatory actions
- Regulatory flexibility to manage and schedule plant implementation consistent with safety significance
  - Build on NRC's Integrated Safety Assessment Program (1980s and early 1990s) that included the use of flexible and integrated schedules

## Initial Actions

- Commission's proposed initiative, Improving Nuclear Safety and Regulatory Efficiency
- 24 initial industry recommendations on regulatory actions for improving safety, regulatory efficiency and predictability
- NRC working level meetings

# Challenges & Issues

- Prioritization process for fuel cycle facilities
- Prioritization criteria for EP, Security & Rad. Protection
- Disposition of low safety significant regulatory actions that are not in the outage/work schedule
- Inclusions of inspections
- Development of more accurate (realistic) regulatory estimates of implementation
- Regulatory tool/process for approving integrated schedules
- Process needs to reduce and balance resource burden consistent with safety significance and performance
- Addressing outage schedule information in public arena

# Provisional Schedule

- July 2013 -- Process description (*power reactors*) white paper
- August 2013 -- NRC review and input
- Pilot plants to assist in guidance development
  - December 2013 -- NRC endorsement of pilot guidance
- Summer 2014 -- Complete pilots
- Updated guidance and NRC endorsement by 2015

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