FUEL CYCLE INDUSTRY VIEWS ON AN ENHANCED NRC OVERSIGHT PROGRAM

April 29, 2010

Nuclear Energy Institute

and Facility Representatives

Presentation Outline

- Opening Remarks
- Diverse Fuel Facilities Description
- Our Common Goals for Enhanced Oversight Process
- Tenets of Enhanced Oversight Process
- Path Forward
- Concluding Remarks

Opening Remarks

- Facilities are operating safely and protecting public health and safety
- Opportunities exist to improve NRC oversight program, but not broken
- Our mutual goals are increased transparency, predictability, objectivity, and increased use of risk information
- Industry will continue to work with NRC

Diverse Fuel Facilities

- Operate and licensed differently under Parts 40, 70 and 76
- Operations and processes vary widely, e.g., Categories I and III under Part 70
- Risk profile very different from reactors
- Diversity of regulatory resources, e.g., resident inspectors at 3 facilities – placement criteria not transparent

Enhanced Program Goals

- Improve existing adequate program
- Increased transparency, predictability, and objectivity and use of risk information
- Maximize use of reported data and information, e.g., Integrated Safety Analysis and other analyses
- Risk prioritize respective resources

Tenets of Enhanced Oversight

- Performance deficiency definition
- Significance Determination Process
- Performance Indicators not necessary
- Risk scale equity vs. commercial reactors
- Feedback mechanism drives resources
- NRC infrastructure supports performance-based inspections
- Enforcement policy should reflect risk

Path Forward

- Prioritize this effort with other NRC regulatory initiatives, e.g., Part 70 working group products among others
- Detailed project plan with resources loaded must be supportable by NRC and industry
- Consider developing success criteria

Concluding Remarks

- Prioritize initiative and effectively engage industry and stakeholders
- Diverse facilities with available risk information & data to inform process
- Safety is industry's highest priority
- Industry will continue to work with NRC

BACKUP SLIDES

Diverse Fuel Facilities

Part 70 Facilities		
AREVA NP – Lynchburg	Fuel Fab	Cat III
AREVA NP – Richland	Fuel Fab	Cat III
AREVA – Eagle Rock	Enrichment	
B&W – Lynchburg	Fuel	Cat I
GEH – Global Nuclear Fuel	Fuel Fab	Cat III
GEH – Global Laser Enrichment	Enrichment	
LES – National Enrichment Facility	Enrichment	
NFS – Erwin	Fuel Fab	Cat III
NFS – Erwin	Fuel	Cat I
Shaw, AREVA, MOX Services	Fuel	Cat I
USEC – American Centrifuge	Enrichment	
Westinghouse – Columbia	Fuel Fab	Cat III
Part 76 Facilities		
USEC – Paducah	Enrichment	
USEC – Portsmouth	Enrichment	
Part 40 Facilities		
Honeywell – Metropolis	UF6 Production	
International Isotopes – Hobbs, NM	De-Conversion	

Current Regulatory Initiatives Requiring Industry Support

HIGH Priority:

- Part 70, Appendix A, Petition for Rulemaking
- Part 70, App A, ISG – Reportable Events
- Part 70.72, DG-3037 – Facility Change Process
- Chemical Dermal Exposure Standards
- Design Features and Bounding Assumptions
- Draft NUREG 1520

Current Regulatory Initiatives Requiring Industry Support (cont'd)

MEDIUM Priority:

- Digital Instrumentation & Control ISG
- Soluble Uranium Intake Draft Guidance
- Safety Culture Policy and its implementation
- Draft Inspection Procedure on SGI Rule
- Implementation of Part 73 Weapons Rule
- Chemical Security Gap Analysis & Site Visits

Current Regulatory Initiatives Requiring Industry Support (cont'd)

LOW Priority:

- DG-3038 - SRP for Pu Processing Plants
- DG-8039 - EDE for External Exposures
- DG-8032 - Planned Special Exposures
- DG-4017 - Monitoring/Reporting Effluents
- DG-3040 - Embankment Systems at FCFs
- DG-8040 - HP Surveys at FCFs
- DG-8036 - Use of Personnel Dosimeters