RESPONSE SHEET

TO:	Annette Vietti-Cook, Secretary
FROM:	Chairman Allison M. Macfarlane
SUBJECT:	COMSECY-14-0014 – CUMULATIVE EFFECTS OF REGULATION AND RISK PRIORITIZATION INITIATIVE: UPDATE ON RECENT ACTIVITIES AND RECOMMENDATIONS FOR PATH FORWARD
Approved X	Disapproved Abstain
Not Participatin	g
COMMENTS:	Below Attached _X None

SIGNATURE 5/29/14 DATE

Entered on "STARS" Yes X No

Chairman Macfarlane's Comments COMSECY-14-0014, "CUMULATIVE EFFECTS OF REGULATION AND RISK PRIORITIZATION INITIATIVE: UPDATE ON RECENT ACTIVITIES AND RECOMMENDATIONS FOR PATH FORWARD"

I approve the staff's plan to merge the deliverables associated with the Cumulative Effects of Regulation (CER) and the staff's response to Staff Requirement Memorandum (SRM) COMGEA-12-0001/COMMWDM-12-0002, "Proposed Initiative to Improve Nuclear Safety and Regulatory Efficiency", commonly known as the Risk Prioritization Initiative (RPI).

I support the points made by several of my colleagues that the notation vote paper should consider regulatory process changes that would be required for a plant-specific prioritization process and should provide a discussion on how corrective actions for findings, violations, and degraded or nonconforming conditions would be treated in the process. I also agree that the staff should brief the full ACRS on the paper, provide a Commissioner Assistant's note before July 2014 covering relevant issues, and be prepared to provide individual Commissioner briefings prior to sending the notation vote paper to the Commission.

I would like to re-emphasize the need for the initiative to consider issue management and use of a backstop so that activities that enter any proposed process are not deferred for extended periods of time, or inappropriately dropped or eliminated, if the activities involved actions in response to regulatory requirements.

Macfarlane

Date