



Overview of Backfit Experience Gained in the Regulatory Guide Update Program

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Context and Background

- **Key references**

- Backfit rule
- Committee to Review Generic Requirements Charter (CRGR)
- Management Directive MD 8.4 “Management of Facility-Specific Backfitting and Information Collection”
- NUREG-1409 “Backfitting Guidelines”

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Context and Background

- **Regulatory Guide Update Program**

- Commission directed
- Over 450 regulatory guides
- Regulatory guides are the pre-eminent documents containing staff positions
- Backfit discussed in “Implementation Section” at the end of the guides

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Improvements and Suggestions

- Complete development of MD 3.5 "Regulatory Guide Program"
- Refine guidance on "voluntary"
- Continue to refine boiler plate statements
- Encourage comments on Regulatory Guide Implementation Section
- Explore issue of initial staff position
- Engage more often with the program staff on backfit issues
- Make backfit considerations easier
- Explore generic communication/regulatory guide update issue



Summary

- Regulatory guide program providing important insights for the backfit issue
- Insights improve with robust public participation in the process
- Continue to translate insights into infrastructure
