



Cumulative Effects of Regulation (CER)

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CER: Definition

“Cumulative Effects of Regulation describes the **challenges** that licensees, or other impacted entities (such as State partners) face while **implementing new regulatory positions, programs, or requirements** (e.g., rules, generic letters, backfits, inspections). Cumulative Effects of Regulation is an organizational effectiveness challenge that results from a licensee or impacted entity implementing a number of complex regulatory positions, programs or requirements within a **limited implementation period and with available resources** (which may include limited available expertise to address a specific issue). Cumulative Effects of Regulation can potentially distract licensee or entity staff from executing other primary duties that ensure safety or security.”

– SECY-12-0137



What This Really Means

- Resources for the NRC and licensees are finite. Difficulties can arise when multiple regulatory actions are implemented at the same time.
- The CER process enhancements aim to create implementation schedules that maintains focus on safety.



CER: Background

- Staff Requirements Memorandum (SRM) M091208, "Enhancements to Emergency Preparedness Regulations," January 13, 2010
 - "For this and future rulemakings the staff should consider if the schedule for implementing those new regulations should be influenced by the aggregate impact of new regulations(s) and others that may already be scheduled for implementation."

CER: Background

- SECY-11-0032, "Consideration of the Cumulative Effects of Regulation in the Rulemaking Process"
- SECY-12-0137, "Implementation of the Cumulative Effects of Regulation Process Changes"
- COMSECY-14-0014, "Cumulative Effects of Regulation and Risk Prioritization Initiative: Update on Recent Activities and Recommendations for Path Forward"

CER: Rulemaking Process Enhancements

- Increase interaction during all phases of rulemaking
- Request specific comments on CER during public comment period of proposed rule
- Publish draft guidance with proposed rules and final guidance with final rules
- Conduct a public meeting on implementation during the final rule stage

Next Steps

- Commission paper due March 2015
 - Provide recommendations for additional CER process enhancements
 - Report findings of Regulatory Analysis case studies and process enhancements to improve cost estimating
 - Provide recommendations related to the Risk Prioritization Initiative (RPI)
- Commission meeting (TBD)



Questions?

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