

Proposed Framework for Establishing National Materials Program Priorities

Alliance: A cooperative process between the Agreement States and NRC that identifies radiation safety regulatory priorities and the means to address those priorities.

Function and Structure of Groups within the Alliance:

- **The Priorities Committee**

The Priorities Committee develops and provides recommendations to address regulatory needs of the National Materials Program (NMP). This committee is made up of representatives of the United States Nuclear Regulatory Commission (NRC) and Agreement States, appointed by NRC Directors and the Board of Directors of the Organization of Agreement States, Inc. (OAS) and the Conference of Radiation Control Program Directors, Inc. (CRCPD). Members will serve for identified staggered terms. The Committee will convene twice annually for a prioritization process meeting and communicate via teleconference and electronic mail as needed. The Priorities Committee also acts as a clearinghouse for new priorities that arise in the Agreement States or NRC regulatory programs or that are identified by other stakeholder groups and communicated to the committee.

- **The Steering Committee**

The Steering Committee provides management oversight of and directs the Alliance process and makes decisions on cooperative Agreement State and NRC regulatory efforts. This committee is made up of NRC Directors of the Offices of State and Tribal Programs (STP), Nuclear Material Safety and Safeguards (NMSS), and Nuclear Security and Incident Response (NSIR); an NRC Regional Division of Nuclear Materials Safety (DNMS) Director; and the Chairs of OAS and CRCPD (or their designees).

- **The Administrative Core**

The Administrative Core provides administrative and logistical support for the NMP and can be considered the support staff for the Alliance membership. Support includes the tracking of Alliance assignments and products as well as the maintenance of the information infrastructure. Initially, the Administrative Core function will be supported by STP. The function may be reassigned to the CRCPD Office of the Executive Director at a future time. No decisions or actions on technical or policy issues related to the established priorities may be made by the administrative component of the Alliance; this would negate the consensus nature of the Alliance. The Administrative Core facilitates and enables the Alliance to operate efficiently.

The responsibilities of the Administrative Core within the Alliance include:

1. Planning, coordination and logistics

The Administrative Core coordinates the logistics of Alliance meetings, whether those meetings are physical or virtual meetings, including arranging for meeting locales and reservations and

notification of the arrangements to Alliance members. The Administrative Core could also provide facilitation for these meetings.

2. Tracking Alliance assignments/products

The Administrative Core will maintain documentation of the priorities identified and assignments made by the Steering Committee, including the specific work products, the individuals assigned, and schedules associated with the assignments. The Administrative Core will report any information regarding the assignment to the Steering Committee, who are responsible for evaluating progress and ensuring the quality of products.

3. Maintaining Information Infrastructure

An information infrastructure will be established to provide a centralized point for the collection of information, such as regulatory needs, Centers of Expertise, alternative resources, and current successes. Maintenance of the information infrastructure will be provided by the Administrative Core.

Prioritization Process:

1. Regulatory needs are identified to the Administrative Core by the Agreement States and NRC and are communicated to the Priorities Committee. The Agreement States and NRC will consider input from other stakeholders, including licensees, the public, professional organizations, industry organizations, and other Federal and State agencies with an interest in radiation issues. A planning session involving the Steering Committee, Priorities Committee and stakeholders early in the process will give useful insights into technical issues, and other factors that may impact the prioritization process.
2. The Priorities Committee analyzes the identified regulatory needs by determining if the need is currently being addressed, can be combined with a previously identified need, or can be addressed at the next prioritization process meeting. The Priorities Committee develops and maintains a database of regulatory needs.

NOTE: If an issue is determined to be urgent, the Priorities Committee will research the issue and make a recommendation to the Steering Committee regarding its priority and disposition.

3. The Priorities Committee seeks input annually from Agreement States and NRC on the level of priority for identified regulatory needs to be addressed at the next prioritization process meeting. Mechanisms for providing input to the Priorities Committee may include: surveys of the materials programs of NRC Offices and Agreement States and focused discussions at annual OAS, CRCPD, or special called meetings.
4. The Priorities Committee numerically evaluates the input to create a prioritized list of the regulatory needs. The Committee then researches the top priorities to make recommendations to the Steering Committee. The Priorities Committee will address each of the top regulatory needs individually and agree upon the most appropriate

course of action. Possible actions include: (1) recommending that a working group be formed to address the priority, including the organization that will have lead responsibility for the group; (2) that the priority has been fully handled through existing products and that these products merely need to be shared with various stakeholders; (3) that no action is necessary; (4) that NRC address the priority; or (5) that an Agreement State address the priority. Regulatory needs that are not found to be top regulatory needs would be re-prioritized at the next prioritization process meeting.

The Priority Committee will reach a consensus position on the recommended course of action for each regulatory need. If a consensus cannot be reached, several courses of action can be recommended. A vote would be taken and a simple majority would then decide which position would be the preferred option. If additional clarification on a specific regulatory need is necessary before a decision can be reached, the Priorities Committee will further research the topic. Regulatory needs for which both NRC and Agreement States do not have authority will be addressed by the individual organization responsible.

5. A Priorities Committee Recommendation form will be used by the Priorities Committee to present recommendations on the top priorities to the Steering Committee. The form will provide information to assist the Steering Committee in making decisions on implementing plans for work to address specific regulatory needs, including:
 - a. Definition of Regulatory Need – A brief description of the need, including the necessity to address the need, specific information on the scope of the need, and the resources necessary to fully address the specific issue.
 - b. Centers of Expertise and Alternate Resources – The Priorities Committee will examine options for the most efficient and effective method of developing the appropriate work product. The most up-to-date knowledge and experience involving a particular use of radioactive material or regulatory issue may not lie within any one Federal or State agency. Staff from one or more State programs and NRC or other Federal agencies may be identified as having expertise in the designated topic, including those agencies that may have already addressed the need through legislation, rulemaking, guidance or policy. Another center of expertise may be an existing working group within the CRCPD or OAS that has both State and Federal members or resource personnel. Current successes by individual agencies, whether individual State or Federal, in addressing the particular regulatory issue will also be identified as an option for the efficient development of a work product. In addition, alternate resources, such as consensus standards developed by national or international radiation professional organizations, or the involvement or particular professional organizations, may also be included in the recommendations.
 - c. Work Products to be Developed – Specifics on the document(s) to be developed (e.g., draft rules, licensing/inspection guidance, State/Federal policy).
 - d. Estimate of Staff Resources, Travel, and/or Other Expenses – In recommending proposed actions to the Steering Committee, the Priorities Committee will provide an estimate of the FTE commitment needed to develop the specific work

products by Agreement State and NRC personnel, as well as the level of involvement of the Administrative Core, since the Administrative Core will track the projects and may provide further logistical support for working groups. If travel and other expenses are anticipated for the project, the cost estimate for those items will be delineated.

- e. Other recommendations as appropriate.
6. The Steering Committee determines what priorities will be worked on, defines specific work products, and determines by whom the product will be developed, with consideration given to budget and other resource requirements. The Steering Committee will reach a consensus position on the course of action for each recommended priority. The Steering Committee will use information from their individual budget processes to make decisions and reach consensus on recommendations. If a consensus is not apparent: (1) a vote can be taken and a simple majority would then decide the Steering Committee's position; or (2) if one or more members of the Steering Committee request additional information before deciding upon a course of action, the Steering Committee can delay their decision and request that additional information be gathered by the Priorities Committee.

The Steering Committee will address each priority individually and decide the most appropriate course of action. Possible actions include: (1) directing that a working group be formed to address the priority, including the organization that will have lead responsibility for the group; (2) that the priority has been fully handled through existing products and that these products merely need to be shared with various stakeholders; (3) that additional information is needed before a decision can be reached; (4) that no action is necessary; (5) that NRC address the priority; or (6) an Agreement State address the priority. If the Steering Committee decides that no action is needed for a particular priority, the Steering Committee will note the justification behind the decision, and direct whether the priority will be re-addressed by the Priorities Committee during their next prioritization process meeting.

The Priorities Committee and Steering Committee may hold joint meetings or teleconferences to identify and further define the work products needed and discuss ways each of the work products can be developed most efficiently and effectively with the budgetary and staff resources, and time constraints of all affected agencies and organizations.

7. Decisions of the Steering Committee are communicated to the Priorities Committee by the Administrative Core. Once projects are determined and the resources are committed, the Administrative Core works with the project leaders and tracks the progress of work product development. The lead organization, NRC office, or Agreement State responsible for developing specific work products is also responsible for ensuring that schedules are met. The Steering Committee utilizes input from the Administrative Core to evaluate progress and ensure the quality of final products.

Working groups assigned work products by the Steering Committee may consist of varying combinations of State and NRC staff, other centers of expertise, and/or other resource members, depending on the issue and product to be developed. Working

groups will follow the approved guidance in NRC Management Directive 5.3, NRC/Agreement State Working Groups, as applicable. Items assigned to working groups led by CRCPD, OAS, or other organizations will follow guidance developed by the individual organizations. Final products should receive legal review by NRC's Office of General Counsel.