NRC/State Working Group on Event Reporting
MEETING SUMMARY
December 13-14, 2000
NRC Headquarters
Rockville, MD

Attendees:

Robert Dansereau	NYS/DOH (OAS Co-Chair)
Kevin Hsueh	NRC/STP
Harriet Karagiannis	NRC/RES
Kevin Ramsey	NRC/NMSS (NRC Co-Chair)
Steve Sandin	NRC/IRO
Agi Seaton	CSC (facilitator)
Mark Sitek	NRC/NMSS
Helen Watkins	TX/BRC

Summary of Steering Committee Briefing

There was extensive discussion of the December 11 briefing for the National Materials Program Steering Committee (SC). We did not receive significant feedback on the draft report because many of the SC members had not been able to read the report before the briefing. The SC is interested in the justification for recommended changes. In some cases, the justification is unclear. Where the Working Group (WG) identified regulations to be considered for burden reduction, the type of burden reduction should be specified (extend report deadline, delete requirement, etc.). The SC agreed that old DOS-based computer systems should be upgraded and believes that NMED should be made available to the public unless we have a strong basis for withholding it. Carl Paperiello tasked Don Cool with consolidating SC comments for his review so the WG is provided a single set of SC comments.

Review Task 1 Recommendations

The WG reviewed each Task 1 recommendation, classified the priority, and identified changes that should be made. The results are documented in Attachment 2. The WG also reviewed the reporting requirements table (Appendix D of the WG report) and focused on the safety significance and recommendation columns. The WG decided to withdraw some of the recommendations to consider regulations for burden reduction. A revised table is provided in Attachment 3.

Review Task 2 Recommendations

The WG reviewed each Task 2 recommendation, classified the priority, and identified changes that should be made. The results are documented in Attachment 2.

Review Task 3 Recommendations

The WG reviewed each Task 3 recommendation, classified the priority, and identified changes that should be made. The results are documented in Attachment 2.

Review Task 4 Recommendations

The WG reviewed each Task 4 recommendation, classified the priority, and identified changes that should be made. The results are documented in Attachment 2. In addition, the WG discussed a provision in the charter to address the need for event assessments, by whom, when, and how the results should be shared. A discussion drafted by Bob Dansereau is attached. The WG discussed the questions in the charter and our thoughts are outlined in the following table:

Assess each event for significance to--	Assess for what?	Who should assess?	Assess when?	Share results how?
Affected licensee	Immediate health and safety issues Immediate response actions	Lead inspection office	Immediately after event is reported	NRC and Agreement State event reports
Other licensees	Generic safety issues (including regulations and guidance) Generic response actions	NRC/NMSS should serve as lead coordinator. State efforts should be utilized whenever possible.	60 days after initial report	For licensees: Generic communication or NMSS Licensee Newsletter For regulators: NMED Quarterly Report or monthly e-mail (RadRap)
Regulators	Adequacy of regulations and/or guidance (not addressed above) Resource management (effective/efficient) Performance assessment	IMPEP review teams	During IMPEP review or periodic meeting (every 2 years)	IMPEP report or summary of periodic meeting

Review Task 5 Recommendations

The WG reviewed each Task 5 recommendation, classified the priority, and identified changes that should be made. The results are documented in Attachment 2.

Next Steps

- Kevin Ramsey has lead to revise Task 1. Kevin Hsueh, Helen Watkins, and Brian Smith (NMSS) are asked to review reporting requirements table and provide any additional recommendations

- Helen Watkins has lead to revise Task 2.

- Kevin Hsueh has lead to revise Task 3.

- Bob Dansereau has lead to revise Task 4A.

- Kevin Ramsey has lead to revise Task 4B.

- Mark Sitek has lead to revise Task 5.

- Kevin Ramsey has lead to prepare Executive Summary and Conclusion.

Schedule

12/29/00	Steering Committee comments due.
1/10/00	Revised text due to Kevin Ramsey.
1/17/00	Working Group conference call, 2 pm EST

Attachments

1. Task 4A discussion from Bob Dansereau
2. Revised Recommendations
3. Revised Reporting Requirement Table

Supplemental Discussion for Task 4A

1. Significance to Licensees

Licensees are required, by regulation, and in some instances license conditions, to report specific ("reportable") incidents to their regulatory agency (NRC or an Agreement State). In response, the regulator will initiate actions based on the nature of the event. Actions may include emergency response and assistance, reactive inspection/investigation, requiring the licensee to submit a written report, etc. These will serve to evaluate and mitigate the specific event. Follow-up actions such as review of corrective actions to prevent recurrence, correction of deficiencies (if any) in the radiation protection program and close-out of the event will occur. In certain situations where it is determined that the event was caused by (or in part) by the licensees failure to implement required or appropriate policies and\or procedures, the licensee may be cited for violations of the regulations and\or their license may be cited. Failure to report events as required may also result in cited violations. The event information is reported (shared) with the NRC, where the data is evaluated for generic issues or trends. An event or series of event types may result in the issuance of guidance or regulation for the purpose of preventing occurrence of similar events by other licensees of the same or similar type.

2. Significance to other Licensees

Most, if not all, licensees possess and use materials for the same purpose(s) as others of similar scope or license category. Therefore the potential for an identified type of event or series of events, to occur at another licensee's facility exists. Lessons learned by a licensee may prevent similar occurrences by another licensee. However, in order to have the capability to disseminate lessons learned, events must be reported by individual licensees and all events must be evaluated.

3. Significance for regulators and the adequacy of their programs.

Regulatory agencies are responsible for ensuring that their programs for materials licensing and inspection are adequate to protect health and safety of the public. The event reporting, evaluation and lessons learned process aides the regulator in achieving this goal. Agreement States and NRC Regions receive event reports from licensees in their jurisdiction. Regulators will respond to incidents in a manner commensurate with the situation. Event information is reported/shared with the NRC, where it is collected in the Nuclear Materials Events Data Base (NMED). NRC uses NMED to evaluate events for generic issues and to evaluate the collective (national) program performance. Output of the evaluation processes provides the regulators a performance measure that indicates the success of meeting the goal of protecting health and safety. Also, the regulators may use the evaluation to propose regulations or guidance to reduce the frequency of certain types of incidents.

Revised Recommendations

Task 1 - Comparison of NRC Strategic Plan and NRC Reporting Requirements

Low Need 1 - Deaths from acute exposure to radiation or other hazardous materials. There is no regulation that requires licensees to report deaths. We believe this is an ineffective performance measure because deaths from acute exposures are extremely rare in this country and the result is ~~always~~usually zero. We believe that existing requirements to report significant exposures is a better performance measure.

Recommendation - ~~Delete this measure from the NRC Strategic Plan. If the measure is retained, A clear requirement should be established in the regulations to report deaths from acute exposure to radiation or other hazardous materials.~~ *Overexposures are being monitored, and a resulting death would be investigated extensively even without this measure. Note that deaths are not clearly flagged in NMED - is this needed?*

High Need 2 - Radiation exposures that result in unintended, permanent, functional damage to an organ or a physiological system as determined by a physician. There is no regulation that requires licensees to report this finding. We believe the definition of this measure is awkward because it relies on a medical opinion we will have only when we refer an event to a medical consultant.

Recommendation - Revise the NRC Strategic Plan to define the measure in terms of specific doses and delete the reference to permanent, functional damage to an organ or physiological system. *Need to define better, this information is not always available, will be captured through other measures 20.2202 is a better measure - use this in addition or in place of (provide pros & cons)*

High Need 3 - Hazardous material exposures that result in unintended, permanent, functional damage to an organ or a physiological system as determined by a physician (applies to fuel cycle and uranium recovery activities only). There is no regulation that requires licensees to report this finding. We believe the definition of this measure is awkward because it relies on a medical opinion we will have only when we refer an event to a medical consultant.

Recommendation - Revise the NRC Strategic Plan to define the measure in terms of specific exposure levels and delete the reference to permanent, functional damage to an organ or physiological system. In addition, establish a clear requirement in the regulations defining what hazardous material exposures are significant and requiring licensees to report them. *Same comment - look at new Part 70*

Low Need 4 - Releases that cause an adverse impact on the environment. "Adverse impact" is undefined, but we have been using Criteria I.B.1 of the abnormal occurrence criteria (release to an unrestricted area in concentrations which, if averaged over 24 hours, exceed 5000 times Table 2 of Appendix B to Part 20). There is no regulation that requires licensees to report releases that meet this criteria.

Recommendation - Establish a clear requirement in the regulations defining what releases cause an "adverse impact" and requiring licensees to report them.

Need 5 - Safeguards events specified in Appendix G of Part 73, and loss, theft, or unauthorized production of enriched uranium as specified in 10 CFR 74.11(a). This

measure is defined in terms of existing regulations and nothing appears to be missing or unneeded.

Need 6 - Security events specified in 10 CFR 95.57. This measure is defined in terms of existing regulations and nothing appears to be missing or unneeded.

High Need 7 - Licensed material entering the public domain in an uncontrolled manner. This measure is especially troublesome for the staff because it is so vague. There are several regulations that require licensees to report events involving uncontrolled material, but there is no threshold for the amount of material involved. In addition, the term "public domain" is undefined. It requires a good deal of staff interpretation to determine which events should be counted. This results in hundreds of mostly insignificant being counted. It is difficult to validate the results because hundreds of interpretations can rarely be duplicated.

Recommendation - The NRC Strategic Plan should be revised *(or a footnote should be revised)* to define the measure in terms of unrestricted areas, rather then public domain. "Unrestricted area" is defined in the regulations. In addition, the measure should define what quantity of uncontrolled material is significant,*such as 20.2201.* It would be best to use existing regulations to define these quantities. *Include recommend that this be linked to operating conditions, modify footnote to include....or to address ...,*

Need 8 - Occurrences of accidental criticality. These events are reportable under existing regulations and nothing appears to be missing or unneeded.

Need 9 - Exposures that exceed limits in 20.2203(a)(2). This measure is defined in terms of existing regulations and nothing appears to be missing or unneeded.

Low Need 10 - For fuel cycle facilities, overexposures from radioactive materials extends to other hazardous materials consistent with proposed amendments to 10 CFR Part 70. Reportable chemical exposures are those that exceed license commitments. It would also include chemical exposures involving uranium recovery activities under the Uranium Mill Tailings Radiation Control Act. There is no regulation requiring licensees to report these events because new Part 70 has not been issued. ***Check new Part 70***

Recommendation - Proceed with establishing a clear requirement in the regulations defining what chemical exposures are significant and requiring licensees to report them. Revise the NRC Strategic Plan to define the measure in terms of the new regulation.

Need 11 - Medical events as reported under Part 35. This measure is defined in terms of existing regulations and nothing appears to be missing or unneeded.

Need 12 - Releases reportable under 20.2203(a)(3). This measure is defined in terms of existing regulations and nothing appears to be missing or unneeded.

Low Need 13 - Chemical releases from NRC regulated activities under the Uranium Mill Tailings Radiation Control Act that cause impacts on the environment that can't be mitigated within applicable regulatory limits, using reasonably available methods. There is no regulation that requires licensees to report such releases.

Recommendation - Establish a clear regulation requiring licensees to report these chemical releases.

Low Need 14 - Substantiated cases of attempted malevolent use of source, byproduct or special nuclear material. There is no regulation that requires licensees to report such events.

Recommendation - Establish a clear regulation requiring licensees to report substantiated cases of attempted malevolent use of licensed material.

Task 2

II. Awareness & Accessibility of Guidance

As WG discussions progressed and input was obtained from NRC management and an NRC group tasked to explore the WG charter, a determination was made that not as much focus seemed to be required on this particular task as was outlined in the original draft WG charter. The directive of the WG to examine "Is there adequate guidance?" moved to discussions of "How readily available or easily accessible is the guidance?" The task was reformulated and the ability to provide guidance in a "user friendly" manner arose as a chief objective.

High Recommendations

Recommend a dedicated web page for Event Reports, consider feature where licensees can enter their license number and obtain information applicable to their license type. Also link to reporting requirements by type...

The "user friendly" consideration led to the working group's recommended suggestions for improvement. Recommendations contained three basic items for consideration. These would contain elements for addressing and solving the problem that would appeal to a variety of interests.

1. Index guidance/reporting requirements
2. Consolidate guidance tables (Rearrange)
3. Redesign web site to create electronic links to guidance/reporting requirements

III. Review of Existing Guidance

A. NRC Guidance Documents to Licensees

Currently NRC presents guidance in the NUREG-1556 series documents. Reporting requirements are explained in lengthy and detailed narratives. Included in some volumes (radiography, gauges) is a quick overview in tabular form. A review of the NUREG documents revealed there is no uniform way or consistent manner in which the information is presented. In some cases a table may appear midway through the text, in other cases, it may be included as an appendix.

NOTE - rearrange to separate discussion and associate with recommendation above, add examples

Discussions about these inconsistencies led the group to recommend developing a consistent format and using consistent wording. This could be undertaken a long range goal.

NRC regulations as reporting guidance A short term goal of providing an index to guide users through the "scattered maze" of reporting requirements was recommended. Currently guidance is offered in sections of the regulations specific to a certain type of licensee. Some discussions centered around the confusion that may result if guidance is consolidated in a single document or table that would contain references to many sections of the regulations that may be unrelated to a particular licensee's operations. The consolidated manner of presentation would seem more useful for broad scope licensees and regulators as stakeholders.

There were a number of descriptions of problems associated with making guidance documents more readily available to stakeholders. Concerns were expressed about the resource allocations needed to maintain and update a web-site. Although there was concern that some stakeholders may not be electronically equipped, the recommendation to provide more visible links on web pages whereby reporting requirements could be easily searched for and accessed via the computer received strong support. The electronic links and web site redesign is aligned with commitments to the Strategic Plan. This also fits with the goal to improve communications and acceptability.

B. NRC Guidance Document to Agreement States

INCORPORATE SECTION B INTO TASK 4

Guidance from NRC to AS (&NRC regions) is comprehensively provided in SA-300.

LOW Recommendation

Provide an electronic link to this document on the web-site. Highlight the "basic information sheet" on what is needed in a complete report.

C. General Guidance

Guidance to stakeholders is provided in the form of regulations, references to regulations, license conditions, copies of guidance documents, newsletters, regulatory conferences & workshops, during inspections, web-sites etc. These represent numerous tools to maintain awareness. The consistency and frequency of use of these tools may vary. Further, although compatible, AS maintain regulations that are unique and therefore may vary from state to state in numeric coding and possibly even in interpretation.

IV. Is Rulemaking Required?/Would Better Guidance Improve Event Data?

Currently, AS rulemaking is in a dynamic period and presents an opportunity for modifications. NRC's new Part 35 was also raised as an example of an opportunity to improve on guidance. A thorough discussion of the impact rulemaking could have on improving reports that are submitted is presented under Task 3. Essentially, the WG concluded that consistency of terminology should be focused on as rules are revised.

Task 3

3. Enhance NMED Reporting

Improve the quality of the NMED records

Currently, the event information is requested by the NMED contractor. However, the contractor does not have any effective mechanism to obtain the follow-up event information in a timely manner. Since the frequency of IMPEP review of Agreement State and NRC programs is up to once every four years, the use of IMPEP review may not be an effective mechanism to improve the quality of NMED records.

HIGH Recommendations

- Recommend continued monitoring of NMED statistics on incomplete records, etc. as shown in table X.
- Management establish acceptable goals/performance levels for record completeness...
- Recommend that measures be taken to improve initial quality of records being input into NMED, including identifying important data fields, improving instructions, providing feedback to users identifying gaps and clear instructions/requirements

Based on our review, an average of 11% of NMED records contains incomplete event information for the events that occurred in the year of 1999. The Working Group recommends that NRC staff periodically brief management on the NMED statistics. As a part of the briefings, staff should continue to examine the effectiveness of current mechanisms to ensure that the NMED records are complete and makes recommendations for improvements.

LOW Based on our review of reporting requirements in 10 CFR, the Working Group recommends that the instructions for the preparation of written reports need to be revised to provide consistent formats and terminology among the various sections dealing with event containing. Event information that is required for completeness of the NMED records needs to be explicitly stated in the 10 CFR regulations. *Or augment with guidance*

Improve the quantity of the NMED records

Recommendations

HIGH Based on our review of NRC Region and Agreement State event reporting statistics , the Working Group recommends that NRC staff develop statistical chart showing NRC Regions and Agreement States, types of events, and number of licensees in each category. NRC staff should periodically brief management on the statistics and review differences in reporting rates and identify opportunities for improvement.
Recommend feedback to NMED users

Task 4A - Improve Understanding of Stakeholders

4.1 Basis for Event Reporting

Recommendations:

HIGH **Questionnaire responses indicate that 11 of the 21 who responded are not aware of this performance goal and measure. Therefore there is a need to inform stakeholders about the performance goals, measures and results. SA-300 Handbook on Nuclear Material Event Reporting in the Agreement States should be revised to include a description of the performance goal and measure. Also, the results of the performance measures should be provided to States. NRC's Accountability and Performance Reports contain a Management Summary of the Program Performance. That summary should be included in either an NRC Information Notice, NMSS Licensee Newsletter or NMED Quarterly Report.**

Another Nuclear Materials Safety Performance Goal is to increase public confidence. NRC will continue to forthrightly inform the public about nuclear safety and safeguards incident and issues and proven avenues for meaningful input and dialogue.

MOVE TO TASK 5 - HIGH

Recommendations: Only one of the 21 Agreement States that responded to the questionnaire is in favor of continuing with the NRC policy of posting events on its internet site within 24 hours. Four suggested holding releases for 24 hours, ten suggested 48 hours, several recommended 72 hours, and others recommended holding reports until information can be verified or determine holding time on a case by case basis. The holding times should be made commensurate with the immediate health and safety implications of an event. Guidance should be developed to classify the severity of an incident and establish associated holding times. A delay in posting incident information on the internet should not adversely affect stakeholders (members of the public in this situation) in instances where there is no immediate health and safety implication.

- **Honor agreement with states, in which they have the lead in these events, honor their policy for releasing information**
- **(State and licensee need time to investigate event)**
- **Also need to review policy for generating PNs from state report**

4.2 Event Assessment and Review

Recommendations:

LOW

Each NRC Region is aware of the program to review events for generic issues. Of the 21 Agreement States who responded, 19 are aware of the NRC's program to review events for generic issues. In addition 18 of the 21 Agreement States who responded perform reviews of their incidents for generic issues. Therefore it is reasonable to conclude that States appreciate the value of such reviews. No improvements are required in this area.

4.3 Reporting Events

High

Recommendations: Thirteen AS responses to the questionnaire indicate that they have difficulty providing information within these time frames for reasons including; States don't have enough information within 24 hours, the information can not be verified within 24 hours, they are busy responding to an incident or they are short staffed. States should be allowed at least 48 hours to report significant events to NRC.

Two opinions 1)allow states 48 hours to exercise discretion 2)keep 24 hour notification consistent with regulations and "heads up" is not the issue, the PN and requests for information is the issue

4.6.1 Daily Screening and Regional Calls

LOW

Recommendation: The Working Group recommends assigning these duties to two different individuals.

4.6.2 Event Follow-up

- The event summaries are an effective way to keep upper management informed of significant or sensitive events. The Working Group identified no specific recommendations for improvement in this area.

4.6.3 Weekly Assessment of Generic Issues

Opportunities for Improvement:

- The IMNS Deputy Division Director and the IMNS Branch Chiefs are often absent from GAP meetings. It is common for panel meetings to be conducted with one or two Section Leaders.

LOW **Recommendation:** Revise the procedures to reflect current practice. Assign responsibility for management review of events to Chief of the Materials Safety and Inspection Branch (MSIB). Other managers can continue to participate as their schedules permit.

- Although most reports are closed, a few events are left open each week because the initial event reports often don't contain enough information to conclude whether a generic follow-up action is needed. It can take several weeks to receive written reports containing investigation results. This has created a long list of pending items that is difficult to manage. In addition, inspectors have complained that responding to requests for additional information makes it difficult to complete their investigations.

HIGH **Recommendation:** Stop reviewing event reports for generic issues a few days after they are reported. Review event reports for generic issues 60 days after the initial report date. The daily calls and briefings conducted by the IMNS Regional Coordinator are sufficient to identify and follow-up on immediate safety issues. Waiting 60 days will allow investigation reports to be completed and the assessment of generic issues will be more effective after investigation results are known. We believe this would improve the efficiency of the process because requests for additional information would be minimized.

- There is a general concern that Agreement States and NRC Regional Offices receive little feedback in return for significant resources invested in documenting event reports. The Working Group believes that assessments performed by NMSS are often filed away without distribution to State and regional staff.

HIGH **Recommendation:** NMSS should develop mechanisms to improve feedback including distribution of assessment results to State and regional staff.

Add more detail: Use NMED quarterly report, consider monthly e-mail

4.6.4 Generic Follow-up

Opportunities for Improvement:

- The Working Group identified no specific recommendations for improvement in this area.

4.6.5 Monthly Operational Events Briefing

Opportunities for Improvement:

- Concerns have been raised recently about inappropriate comments at these briefings, and the usefulness of the briefings has been questioned. The Working Group believes these briefings provide a good forum for discussing issues and exchanging information among NRC and Agreement State staff. However, previously unidentified concerns about the performance of NRC Regions or Agreement States should be discussed directly with those offices. Regional and Agreement State staff should be able to participate in these briefings without fear of being embarrassed in front of a large group.

LOW **Recommendation:** The Working Group recommends continuing with the briefings. NMSS should establish guidelines concerning appropriate methods to raise concerns outside of this forum.

4.7.1 Issues and Events Tracking System

Opportunities for Improvement:

- Recommendations concerning IETS are provided under Task 5.

4.7.2 Nuclear Materials Events Database (NMED)

Opportunities for Improvement:

- Recommendations concerning NMED are provided under Tasks 3 and 5.

4.7.3 NMED Quarterly Report

Opportunities for Improvement:

- NMSS recently began issuing this report and only a few issues are available. A few responses to the questionnaire indicated that they were unfamiliar with this report. Several comments on the questionnaire noted that the first issues were not published in a timely manner. The Regions have not found the report useful, but 60 percent of Agreement State responses found it useful.

HIGH

- **Recommendation:** NMSS should make a greater effort to announce issues of the NMED Quarterly Report when they are issued. In addition, the status of each event-related performance measure from the NRC Strategic Plan should be incorporated into the report. NMSS should consider obtaining input from Agreement States when draft reports are being prepared.

4.7.4 Generic Communications

Opportunities for Improvement:

- Responses to the questionnaire found NRC Information Notices very useful. The NMSS Licensee Newsletter was found useful, but not timely.

LOW **Recommendation:** NMSS should improve the timeliness of the NMSS Licensee Newsletter.

4.7.5 Regulatory Guidance

Opportunities for Improvement:

- Working Group recommendations for guidance are addressed under Task 2.

4.7.6 Regulations

Opportunities for Improvement:

- The Working Group recommendations for rulemaking are addressed under Tasks 1 and 3.

5.2.2 Preliminary Notifications (PNs) and Morning Reports (MRs)

Opportunities for Improvement:

LOW The software used for the PN and MR systems is under the control of NRR. The working group believes the processes used in the existing systems are outdated and inefficient. However, it is our understanding that NRR has no plans to upgrade these systems. We believe that maintenance and troubleshooting will become more difficult as these systems age. We recommend that NMSS and the Regions work with NRR to develop a plan to upgrade the PN and MR systems.

5.3.1 National Databases - Nuclear Materials Events Database (NMED)

Opportunities for Improvement and Planned Upgrades:

In order to make the use of NMED more effective and efficient, several upgrades are under way. By the end of the year 2000, the internet version and Agreement State local versions of the database will be upgraded. The internet version will be modified to provide the functionality that currently exists in the Access versions of the database. More search and query options will be present to allow for more customizable use of the database. The Agreement State local versions will be upgraded to Access 2000, also by the end of the year 2000. This version will allow the Agreement State personnel to send new NMED event records directly from Access as opposed to emailing and attaching a file with the event information. Furthermore, this upgrade will allow the Agreement State users to hyperlink to the national database from their local versions.

In addition to the major upgrades planned for the system, INEEL has a list of approximately seventy suggestions from various NMED stakeholders on how to improve the NMED software. The working group recommends implementing those changes that would make the software more effective and efficient. These changes should center around making the entry of data into the system more consistent and easier. Furthermore, changes that reduce the ambiguity of the data along with increasing the accuracy of the data should also be the focus of planned upgrades.

LOW RECOMMENDATION: The working group identified two specific changes to the software that would help increase its effectiveness and efficiency: 1. the addition of hyperlinks to reference documents and 2. resolution information. Often times staff refer to reference documents in order to extract event details that are not captured by the NMED record. In order to increase the efficiency of NMED, the working group recommends that the ADAMS accession number for all reference documents used to generate the NMED record be included as part of the event records and, if possible, create a hyperlink to ADAMS that automatically retrieves the reference documents. In order to achieve this unilaterally, all Agreement State documents will need to be input into ADAMS so that they can be assigned an accession number.

The second working group recommendation for the NMED system is to include a data field that indicates whether the NMED record is complete. In other words, all the information that is needed for a complete NMED record has been coded into the record and no additional information is needed nor anticipated. An additional field which indicates whether all regulatory actions on the event have been completed would also allow NMED users to determine the "status" of event follow-up. Furthermore, it would be an indication as to whether additional information on the event is anticipated. The addition of this second field would add an administrative burden on Agreement States and NRC Regions to report back to the NMED contractor on every event report. This burden needs to be balanced with the burden placed on Agreement State and NRC Regional staff to verbally verify the status of events.

5.3.2 International Database - Radiation Events Database (RADEV)

Opportunities for Improvement:

LOW Recommendations on NRC's participation in this database are included in Section 5.5 of the report.

5.4 Action Tracking Systems

5.4.1 NRC Headquarters

Issue and Events Tracking System (IETS)

5.4.2 NRC Regional Offices

Opportunities for Improvement:

Section 5.5 on specific software issues includes the working group's recommendation in this area.

5.4.3 Agreement States

5.5 Specific Issues

The charter posed four direct questions regarding software systems:

Issue 1: Should NRC delay the posting of event reports on the external NRC website? Recommendation no. 22 from the Incident Response Function Self Assessment Report states that IRO and STP should work with OCIO to identify approaches to allow for a reasonable time delay (24 hours minimum) in posting 24-hour material event reports on the NRC external website.

High Recommendation:

IRO has already started the process of changing their software to allow for the delay of the posting of Agreement State events to the NRC's external website. A complete description of the issues and software changes is provided in this section. The working group recommends that IRO continue to modify their software as planned and as described as follows.

Several Agreement States requested, through the Office of State and Tribal Programs, that the NRC delay posting their reports on the NRC website for a minimum of 24 hours or longer. They believe the delay is warranted because it will allow them to better manage their resources and provide the public more complete information. As a result of NRC not delaying the posting of events, it is believed that some Agreement States delay making their reports until more complete information is available or their investigation is complete.

Incident Response Operations (IRO) requested that the Office of General Counsel (OGC) review the Agreement State request to determine whether there were any legal objections preventing the NRC from delaying the posting of Agreement State reports on the NRC website. OGC concluded that there was "no legal reason why the agency cannot change its procedures and delay entering the data . . ." This position is supported by IRO Management.

IRO is requesting that their software contractor revise the existing software to allow for any requested delay in posting Agreement State reports to the NRC website. This request includes the following items:

<u>Agreement State Reports</u>

Revise or extend program to allow delay in release to internet on a case-by-case basis. The default should be the current date. An additional field unique to this screen will be created that allows users to enter a "release date" in mm/dd/yr format. Also, if any date other than the default appears, the current internet release would generate a null report stating "Event # xxxx is an Agreement State report which will be available on mm/dd/yr." The internal NRC release would contain the report and not be affected.

Modify HOO software to identify an Agreement State Report under the "Event Type." .

All Reports

Revise or extend program to allow delay in release of both internal NRC and internet security related reports on a case basis. Occasionally, we receive security reports involving ongoing law enforcement investigations. At the request of either law enforcement or the IAT, we will suspend release until directed otherwise. However, it's important that we enter the information and have the ability to track the report in the HOO database. Both the internal NRC and internet releases would generate a null report stating "Event # xxxx is the subject of an ongoing investigation and will be made available at a later date."

Issue 2: Should NRC continue the use of separate event tracking systems in each office, or should one tracking system be used by NMSS and the Regions? This issue was raised during the 1999 Region IV IMPEP Review.

Recommendation:

LOW

The working group recommends that separate tracking systems continue to be used in the Regions. One region stated that follow-up to an event is scheduled by the regional office and several things are taken into consideration, such as the urgency to obtain additional information, the potential safety significance, the prioritization of resources, and available opportunities. For events that do not require immediate follow-up, the projected schedule may shift due to higher priority activities. The follow-up process should be left up to the Region because there is little benefit in tracking such details on an agency-wide basis. Tracking at higher levels requires feeding a system with many low safety-significant events and may have the unintended effect of placing a higher priority on them.

Furthermore, a region recommended that an electronic tracking system be developed by Headquarters and provided to the Regions for local tracking of actions. The working group endorses this recommendation and recommends that any system that is developed not be agency-wide in order to reduce the costs to develop and maintain the system. An electronic system would allow the Regions to easily transmit event follow-up data to NMED and/or IETS with little administrative burden. Any system developed for the Regions should be designed as a work product expressly tailored to the Regions needs associated with the tracking of event follow-up.

Issue 3: Should NMED be made available to the public, and if so, what conditions and restrictions should be applied?

Recommendation:

LOW

The working group is still evaluating its final recommendation of this issue. However, the advantages and disadvantages to allowing the public access to NMED have been discussed.

Pros: Allowing the public access to NMED would increase public confidence and allows licensees and the public to view operational event data in one, condensed location (most, if not all**,** of the information is already publically available just not in this form). The public can then perform trend analyses of their own. Furthermore, the public/licensees can check for specific events at sites similar to their own to avoid similar events/problems.

Cons: There are mistakes and incomplete records in NMED which could lead to incorrect conclusions being drawn. A contractor inputs the data into the system without direct consultation with NRC and/or licensees to ensure the accuracy of the data (there is a lack of a checks and balances system). In addition, the software font often results in units being improperly displayed in NMED. If NMED goes public we need to ensure with greater diligence that each record is accurate.

The working group does recommend, at a minimum, that the NMED quarterly reports be made available to the public.

Recommend that the information be made public, not sufficient reason found to withhold, puts more emphasis on accuracy of the data NOTE that data could be downloaded and analyzed by public

Issue 4: Should NRC participate in the IAEA materials event database, and what information would we share with IAEA?

Recommendation:

LOW

The working group believes that the NRC should participate in the RADEV database maintained by IAEA. The database was developed with assistance from NRC and modeled after the NRC's own event archive database, NMED. Information could be shared very easily by utilizing and transmitting the existing data in NMED. The impact on staff would be minimal, provided that an appropriate threshold for events is developed. NRC representatives are involved with the IAEA team responsible for the implementation along with the development of the database. The IAEA team will determine the threshold for events that should be included. In general, however, the working group recommends that only significant events be included, such as those that resulted in AO criteria being exceeded or the loss or release of large amounts of radioactivity.

5.6 Conclusions and Additional Recommendations:

The various software systems used in the notification, tracking, and archiving of materials event data share information with one another as depicted in Figure 5-2. The actual direct electronic transfer of data among the systems is depicted in Figure 5-3. A comparison of these two figures demonstrates that there are areas where software systems could interact directly with one another. From Figure 5-2 it can be seen that the NMED system either relies on data or transmits data to all of the other systems. NMED could be made more comprehensive by directly incorporating all of the other systems into itself. However, the working group does not recommend such consolidation because the various other systems have specific purposes other than event archiving (unlike NMED), as seen in Table 5-1. Furthermore, these systems are controlled, maintained, and utilized by many different organizations both internal and external to the NRC. The NMED system could, however, interact or link to electronic systems such as IETS, Regional software, or Agreement State software to provide information on the status of generic follow-up activities. Such an interaction would assist the NMED contractor's efforts to accurately incorporate and update event information. Any new software interactions should be of minimal burden to NRC and Agreement State staff.

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Review of NRC Reporting Requirements
(Revised on 12/13/2000)

10 CFR	Reporting Requirement	Strategic Plan Link	Agreement State Compatibility[1]	Safety Significance[2]	Recommendation
Part 20					
20.1906(d)(1)	(Immediate report) Removable contamination on package	--	D/H&S	Varies (low)	24-hour report
(d)(2)	(Immediate report) Radiation levels on package	--	D/H&S	Varies (moderate)	
20.2201(a)(1)(i)	(Immediate report) Lost/stolen/missing material ≥ 1000 X App. C value	Need 7	C	Varies (moderate)	
(a)(1)(ii)	(30-day report) Lost/stolen/missing material ≥ 10 X App. C value	Need 7	C	Low	
20.2202(a)(1)	(Immediate report) Exposure (real or threatened) ≥ TEDE of 25 rem, or LDE of 75 rem, or SDE (WB or ME) of 250 rads	Need 1 Need 2	C	High	
(b)(1)	(24-hour report) Exposure (real or threatened) ≥ TEDE of 5 rem, or LDE of 15 rem, or SDE (WB or ME) of 50 rads	--	C	Moderate	
20.2202(a)(2)	(Immediate report) Release where individual could have intake > 5 X ALI over 24 hrs.	Need 4	C	High	
(b)(2)	(24-hour report) Release where individual could have intake > 1 X ALI over 24 hrs.	--	C	Moderate	
20.2203(a)(2)	(30-day report) Doses in excess of the limits in 20.1201, 20.1207, 20.1208, 20.1301, the license, or ALARA constraints for air emissions in 20.1101(d)	Need 9	C	Moderate	

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10 CFR	Reporting Requirement	Strategic Plan Link	Agreement State Compatibility[1]	Safety Significance[2]	Recommendation
20.2203(a)(3)(i)	(30-day report) Levels of radiation or concentrations of radioactive material in a restricted area in excess of any applicable limit in the license.	Need 12	C	Low	
(a)(3)(ii)	(30-day report) Levels of radiation or concentrations of radioactive material in an unrestricted area in excess of 10 times any applicable limit in Part 20 or in the license.	Need 12 Need 4	C	Low	
20.2203(a)(4)	(30-day report) For licensees subject to EPA standards in 10 CFR Part 190, levels of radiation or releases of radioactive material in excess of those standards, or license conditions related to those standards.	--	C	Low	
20 App. G III.D.3	(60-day report) Notification of missing shipment of radioactive waste (made by land disposal operator)	--	B	Low	
20.App. G III.E.2	(2-week report) Written report of trace investigation of missing shipment (made by shipper)	--	B	Low	
Part 21					
21.21(a)(2)	(60-day report) Interim evaluation report that basic component may be defective, or may not comply with procurement document.	--	None	Varies (Low)	
(c)	(2-day report) Receipt of information reasonably indicating that a basic component is defective or fails to comply with its procurement document.	--	None	Varies (Low)	
Part 26					
26.27(d)	(Immediate report) Notification of NRC employee's unfitness for duty	--	None	Low	Consider for 24-hour report
26.73	(24-hour report) Fitness-for-duty significant event report	--	None	Low	

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10 CFR	Reporting Requirement	Strategic Plan Link	Agreement State Compatibility[1]	Safety Significance[2]	Recommendation
Part 30 -					
30.9(b)	(2-day report) Receipt of any information having significant implication for public health and safety	--	D	Varies (Low)	
30.34(h)	(Immediate report) The filing of any petition for bankruptcy by or against the licensee, its parent, or an affiliate.	--	D/H&S	Varies (Low)	Consider for 2-5 day report
30.50(a)	(4-hour report) Event that prevents immediate protective actions necessary to avoid overexposure or releases.	--	C	Varies (Moderate)	
30.50(b)(1)	(24-hour report) Unplanned contamination requiring access to be restricted for more than 24 hours (for reason other than decay of isotopes with half-lives < 24 hours).	--	C	Varies (Low)	
30.50(b)(2)	(24-hour report) Safety equipment is disabled or fails to function when it is required to be available and operable, and no redundant equipment is available and operable.	--	C	Varies (Low)	
30.50(b)(3)	(24-hour report) An event that requires unplanned medical treatment at a medical facility of an individual with spreadable radioactive contamination on the individual's clothing or body.	--	C	Varies (Low)	
30.50(b)(4)	(24-hour report) An unplanned fire or explosion damaging license material or any device, container, or equipment containing licensed material	--	C	Varies (Low)	
30.55(c)	(Prompt report) Attempted theft or unlawful diversion of tritium	Need 7	NRC	Low	

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10 CFR	Reporting Requirement	Strategic Plan Link	Agreement State Compatibility[1]	Safety Significance[2]	Recommendation
31.5(c)(5)	(30-day report) Failure of, or damage to; or indication of possible failure of, or damage to the shielding, on-off mechanism, or indicator; or detection of 0.005 microcuries of removable RAM	--	C	Low	
34.25(d)	(5-day report) Radiography sealed source leak test results (presence of 0.005 microcuries or more of removable RAM)	--	C	Low	
35.33(a)(1)	(1-day report) Medical misadministration	Need 11 Need 1 Need 2	C	Varies (Moderate)	
35.59(e)(2)	(5-day report) Medical sealed source leak test results (presence of 0.005 microcuries or more of removable RAM)	--	D/H&S	Low	
36.83(a)	(24-hour report) Irradiator events meeting the following conditions if not reported under other parts of NRC regulations: (1) Source stuck in unshielded position. (2) Fire or explosion in a radiation room. (3) Damage to the source racks. (4) Failure of source rack cable or drive mechanism. (5) Inoperable access control system. (6) Detection of radiation by product exit monitor. (7) Detection of radioactive contamination. (8) Structural damage to pool liner or walls. (9) Abnormal water loss or leakage from pool. (10) Pool water conductivity exceeding 100 microsiemens per centimeter.	--	C	Varies (Low)	
39.35(d)(2)	(5-day report) Well logging sealed source leak test results (presence of 0.005 microcuries or more of removable RAM)	--	B	Low	
39.77(a)	(Immediate report) Actual or potential rupture of sealed source capsule	--	C	Moderate	

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10 CFR	Reporting Requirement	Strategic Plan Link	Agreement State Compatibility[1]	Safety Significance[2]	Recommendation
39.77(b)	(Various reports) Events reportable under 20.2201, 20.2202, 20.2203, and 30.50.	--	D	Varies (Low)	Redundant requirement. Consider deleting.
39.77(c)(1)	(Report when apparent) Irretrievable sealed source & request for approval to abandonment	--	C	Low	Report appears to be rubber stamp. Consider authorizing licensees to abandon and simply notify NRC.
40.9(b)	(2-day report) Information having a significant implication for public health and safety or common defense & security	--	D	Varies (Low)	
40.26(c)(2)	(Immediate report) Failure, or unusual conditions that if not corrected could lead to failure, in a tailings or waste retention system that results, or could result in release of tailings or waste into unrestricted area	--	C	Moderate	
40.41(f)	(Immediate report) The filing of any petition for bankruptcy by or against the licensee, its parent, or an affiliate.	--	D	Varies (Low)	Consider for 2-5 day report..
40.60(a)	(4-hour report) Event that prevents immediate protective actions necessary to avoid exposures to radiation or RAM or releases of licensed materials that could exceed reg limits	--	C	Varies (Moderate)	
40.60(b)(1)	(24-hour report) Unplanned contamination requiring access to be restricted for more than 24 hours (for reason other than decay of isotopes with half-lives < 24 hours).	Need 13	C	Varies (Low)	
40.60(b)(2)	(24-hour report) Safety equipment is disabled or fails to function when it is required to be available and operable, and no redundant equipment is available and operable.	--	C	Varies (Low)	

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10 CFR	Reporting Requirement	Strategic Plan Link	Agreement State Compatibility[1]	Safety Significance[2]	Recommendation
40.60(b)(3)	(24-hour report) An event that requires unplanned medical treatment at a medical facility of an individual with spreadable radioactive contamination on the individual's clothing or body.	--	C	Varies (Low)	
40.60(b)(4)	(24-hour report) An unplanned fire or explosion damaging license material or any device, container, or equipment containing licensed material	--	C	Varies (Low)	
40.64(c)	(Prompt report) Attempted theft or unlawful diversion of more than 15 lbs. of uranium or thorium at 1 time or more than 150 lbs. in a calendar year	Need 7	NRC	Low	Appears similar to general license quantities. Consider for 5-day report.
40 App A I	(Immediate report) Failure or unusual conditions in a tailings or waste retention system [that could result in, or if left uncorrected could result in, the release of tailings or waste into unrestricted areas]	--	C States with authority D States without authority	Moderate	
70.9(b)	(2-day report) Information having a significant implication for public health & safety or common defense & security	--	D	Varies (Low)	
70.32(a)(9)	(Immediate report) The filing of any petition for bankruptcy by or against the licensee, its parent, or an affiliate.	--	D/H&S	Varies (Low)	Consider for 2-5 day report.
70.50(a)	(4-hour report) Event that prevents immediate protection actions necessary to avoid exposure to radiation or RAM or releases of licensed material that could exceed regulatory limits	--	C	Varies (Moderate)	
70.50(b)(1)	(24-hour report) Unplanned contamination requiring access to be restricted for more than 24 hours (for reason other than decay of isotopes with half-lives < 24 hours).	--	C	Varies (Low)	

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10 CFR	Reporting Requirement	Strategic Plan Link	Agreement State Compatibility[1]	Safety Significance[2]	Recommendation
70.50(b)(2)	(24-hour report) Safety equipment is disabled or fails to function when it is required to be available and operable, and no redundant equipment is available and operable.	--	C	Varies (Low)	
70.50(b)(3)	(24-hour report) An event that requires unplanned medical treatment at a medical facility of an individual with spreadable radioactive contamination on the individual's clothing or body.	--	C	Varies (Low)	
70.50(b)(4)	(24-hour report) An unplanned fire or explosion damaging license material or any device, container, or equipment containing licensed material	--	C	Varies (Low)	
70.52(a)	(1-hour report) Accidental criticality or of any loss, other than normal operating loss, of SNM	Need 7 Need 8	NRC	High	
70.52(b)	(1-hour report) Loss or theft or unlawful diversion of SNM or of any attempted theft or unlawful diversion of such material	Need 7	NRC	Moderate	
71.6a(b)	(2-day report) Information having a significant implication for public health & safety or common defense & security	--	D	Varies (Low)	
71.95(a) (b)	(30-day report) Significant reduction in effectiveness of authorized packaging during use (30-day report) Safety defects in packaging after first use	--	D	Varies (Low) Varies (Low)	
Part 72 - Refers to Spent Fuel Storage					
72.11(b)	(2-day report) Information having significant implication for public health & safety or common defense & security	--	NRC	Varies (Low)	

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10 CFR	Reporting Requirement	Strategic Plan Link	Agreement State Compatibility[1]	Safety Significance[2]	Recommendation
72.44(b)(6)	(Immediate report) The filing of any petition for bankruptcy by or against the licensee, its parent, or an affiliate.	--	NRC	Varies (Low)	Consider for 2-5 day report.
72.74(a)	(1-hour report) Accidental criticality or loss of SNM	Need 7 Need 8	NRC	High	
72.75(a)	(1-hour report) Declaration of an emergency as specified in the licensee's approved emergency plan	--	NRC	Moderate	
72.75(b)(1)	(4-hour report) Event that prevents immediate protection actions necessary to avoid exposure to radiation or RAM or releases of licensed material that could exceed regulatory limits	--	NRC	Varies (Moderate)	
72.75(b)(2)	(4-hour report) A defect in any spent fuel storage structure, system, or component which is important to safety	--	NRC	Varies (Low)	
72.75(b)(3)	(4-hour report) A significant reduction in the effectiveness of any spent fuel confinement system during use.	--	NRC	Varies (Low)	
72.75(b)(4)	(4-hour report) An action taken in an emergency that departs from a condition or technical specification in a license or certificate of compliance when the action is immediately needed to protect public health and safety and no action consistent with the license or certificate of compliance is immediately apparent.	--	NRC	Varies (Low)	
72.75(b)(5)	(4-hour report) An event that requires unplanned medical treatment at a medical facility of an individual with spreadable radioactive contamination on the individual's clothing or body.	--	NRC	Varies (Low)	
72.75(b)(6)	(4-hour report) An unplanned fire or explosion damaging license material or any device, container, or equipment containing licensed material	--	NRC	Varies (Low)	

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10 CFR	Reporting Requirement	Strategic Plan Link	Agreement State Compatibility[1]	Safety Significance[2]	Recommendation
72.75(c)(1)	(24-hour report) Unplanned contamination requiring access to be restricted for more than 24 hours (for reason other than decay of isotopes with half-lives < 24 hours).	--	NRC	Varies (Low)	
72.75(c)(2)	(24-hour report) Safety equipment is disabled or fails to function when it is required to be available and operable, and no redundant equipment is available and operable.	--	NRC	Varies (Low)	
Part 73 - Security and Safeguards					
73.26(i)(6)	(Immediate report) Failure to receive call at the movement control center from shipment or escort personnel (road shipment)	--	NRC	Low	
73.26(k)(4)	(Immediate report) Failure to receive call at the movement control center from shipment or escort personnel (rail shipment)	--	NRC	Low	
73.27(b)	(Immediate report) Lost or unaccounted for shipment of SSNM [made by licensee receiving formula quantities of strategic SNM]	--	NRC	Moderate	
73.27(b)	(Immediate report) Lost or unaccounted for shipment of SSNM (made by licensee who is consignor when consignee is DOE license-exempt contractor receiving formula quantities of SSNM]	--	NRC	Moderate	
73.71(a)(1)	(1-hour report) Initial notification of loss shipment of SNM or spent fuel	--	NRC	Moderate	
73.71(b)(1)	(1-hour report) Initial notification of safeguards event described in Appendix G of Part 73.	Need 5	NRC	Moderate	
Part 74 -					

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10 CFR	Reporting Requirement	Strategic Plan Link	Agreement State Compatibility[1]	Safety Significance[2]	Recommendation
74.11(a)	(1-hour report) Loss, theft, or unlawful diversion of SNM (or attempted theft or diversion]	Need 5	NRC	Moderate	
74.11(a)	(1-hour report) Notification of unauthorized production of enriched uranium	Need 5	NRC	Low	
74.13(b)	(30-day report) Report of excessive inventory difference	--	NRC	Low	
74.57(c)	(24-hour report) Notification of unresolved material control & accounting alarm	--	NRC	Low	
74.57(f)(2)	(24-hour report) Notification of initiation of MC&A alarm resolution procedure [when abrupt loss detection estimate exceeds 5 formula kilograms of SSNM]	--	NRC	Low	
Part 75					
75.36(b)	(Immediate report) Special report of occurrence of event described in license conditions, including: the possibility of loss of nuclear material in excess of specified limits & unexpected changes in containment to the extent that unauthorized removal of nuclear material has become possible	--	NRC	Moderate	
Part 76					
76.9(b)	(2-day report) Information having significant implication for public health & safety or common defense & security	--	NRC	Varies (Low)	
76.120(a)(1)	(1-hour report) A criticality event	Need 8	NRC	High	
76.120(a)(2)	(1-hour report) Any loss of SNM	Need 7	NRC	Moderate	
76.120(a)(3)	(1-hour report) Any theft or unlawful diversion of SNM (real or attempted)	Need 7	NRC	Moderate	

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10 CFR	Reporting Requirement	Strategic Plan Link	Agreement State Compatibility[1]	Safety Significance[2]	Recommendation
76.120(a)(4)	(1-hour report) An emergency condition that has been declared an Alert or Site Area Emergency	Need 3	NRC	Moderate	
76.120(b)	(4-hour report) Event that prevents immediate protection actions necessary to avoid exposure to radiation or RAM or releases of licensed material that could exceed regulatory limits	--	NRC	Varies (Moderate)	
76.120(c)(1)	(24-hour report) Unplanned contamination requiring access to be restricted for more than 24 hours (for reason other than decay of isotopes with half-lives < 24 hours).	--	NRC	Varies (Low)	
76.120(c)(2)	(24-hour report) Safety equipment is disabled or fails to function when it is required to be available and operable, and no redundant equipment is available and operable.	--	NRC	Varies (Low)	
76.120(c)(3)	(24-hour report) An event that requires unplanned medical treatment at a medical facility of an individual with spreadable radioactive contamination on the individual's clothing or body.	--	NRC	Varies (Low)	
76.120(c)(4)	(24-hour report) An unplanned fire or explosion damaging license material or any device, container, or equipment containing licensed material	--	NRC	Varies (Low)	
Part 95 -					
95.57(a)`	(1-hour report) Alleged or suspected violation of the AEA, Espionage Act, or other Federal statutes related to National Security Information or Restricted Data	Need 6	NRC	Low	
95.57(b)	(Monthly log) Infraction, loss, compromise, or possible compromise of National Security Information or Restricted Data or other classified documents [for incidents not falling under 95.57(a)	Need 6	NRC	Low	

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10 CFR	Reporting Requirement	Strategic Plan Link	Agreement State Compatibility[1]	Safety Significance[2]	Recommendation
Part 110					
110.7a(b)	(2-day report) Notification of information having a significant implication for public health or safety or common defense & security	--	NRC	Varies (Low)	.
110.50(a)(7)	(Prompt report) Notification of violation or potential violation of packaging requirements of 10 CFR 71	--	NRC	Low	
Part 150 -					
150.16(b)(1)	(Immediate report) Initial notification of theft or unlawful diversion, or attempted theft or diversion, of SNM [from Agreement State licensee]	Need 7	NRC	Moderate	
150.17(c)	(Prompt report) Initial notification of attempted theft or unlawful diversion of uranium or thorium [from Agreement State licensee]	Need 7	NRC	Low	
150.19(c)	(Prompt report) Initial notification of attempted theft or unlawful diversion of more than 10 curies of tritium at one time or 100 curies in one calendar year [from Agreement State licensee]	--	NRC	Low	

1. Agreement State Compatibility
   A = Basic radiation protection standard. State should adopt essentially identical language.
   B = Significant transboundary implications. State should adopt essentially identical language.
   C = Program element. State should adopt essential objectives, but language can differ.
   D = Not required for compatibility. If adopted, should be compatible.
   NRC = Not required for compatibility. Regulatory area reserved to NRC.
   H&S = Particular health and safety significance. State should adopt essential objectives.

2. Safety Significance
   Low = Individuals not expected to exceed exposure limits.
   Moderate = Individuals could exceed exposure limits.
   High = Individuals could greatly exceed exposure limits.