

February 22, 2000

SUMMARY OF COMMENTS ON SA-106, MANAGEMENT REVIEW BOARD

December 15, 1999 Memorandum sent to DEDMRS, SP, NMSS, OGC, IRO, HR and Agreement State Liaisons to the Management Review Board

**Steve Collins, Illinois (12/20/99 email)**

**Comment:**

No comments.

**Carl J. Paperiello, DEDMRS (1/6/2000 - via telephone)**

**Comment:**

No comments.

**Stuart Treby, OGC (1/11/2000 - via telephone)**

**Comment:**

No legal objections.

**Martin J. Virgilio, NMSS (1/7/2000 memorandum)**

**Comment:**

In response to your memorandum dated December 15, 1999, the Office of Nuclear Material Safety and Safeguards (NMSS) has reviewed the subject document. NMSS concurs in the revision with one proposed change. NMSS proposes that one additional week be provided for scheduling the Management Review Board (MRB) meetings. Therefore, we would modify text appearing first in Section V.A.1. as follows:

“MRB meetings are to be conducted approximately 74 81 days from the last day of the IMPEP review in order to issue the final report within 104 days.” A similar change is needed in the third sentence of this Section.

This change will provide more scheduling flexibility, particularly on occasions when a State or Region is slow in commenting on the draft report; when those comments take additional time to resolve; or when it is difficult to assemble a quorum by the 74 th day. The change will make it more possible for NMSS and OSP to get the necessary documentation to MRB members at least a week in advance of the MRB meeting (as required under V.B.2, and V.C.1). NMSS does not feel this change will adversely impact the goal of issuing final reports within 104 days.

**Response:**

We disagree with the recommendation that we modifying the goal number of 74 to 81 days for the scheduling of the MRB meetings. During the past 2 years of Agreement State MRBs, OSP has not experienced any difficulty in scheduling the MRB meetings within the goal of 74 days. Since OSP will be coordinating the administrative aspects of the Regional MRB meetings in the future based on this revision to SA-106, OSP does not plan on changing the goal target at this

time. If after we have more experience in coordinating Regional MRBs we determine there are difficulties meeting this goal for the Regional MRBs, we will reconsider modifying the goal.

**Henry Bailey, IRO, (2/2/2000 - via email)**

**Comment:**

No legal objections.