

REGIONAL OFFICE INTERACTIONS

A. PURPOSE

To establish a system for processing the interactions regarding operator licensing between the Regional Offices and the NRR Operator Licensing Program Office such that the following criteria are met:

1. New policies or policy changes that affect the procedures and practices for examining, licensing and re-licensing power reactor operators and senior operators, pursuant to Part 55 of Title 10 of the Code of Federal Regulations, are consistently implemented by all regions.
2. Policy interpretations, applicable to the operator licensing process, are only made by NRC headquarters and are consistently implemented by all the regions.

B. BACKGROUND

1. Pursuant to Section 36.b.(1) of ADM-200, "Delegation of Signature Authority," the program office will provide "procedural and programmatic guidance" to the regions for examining, licensing and re-licensing power reactor operators and senior operators, commensurate with 10 CFR 55. The program office will ensure that the regions consistently implement the operator licensing process in accordance with established procedures and regulations.
2. Frequent interactions occur between the regions and the program office dealing with the interpretation of policy, directives associated with applicant eligibility, or other aspects of the operator licensing process.
3. The system to document these interactions and consistently apply associated actions must be formalized. This system will include an efficient and timely means of distribution and filing. As a result, the loss of, or duplication of, information will be minimized. Furthermore, this system will facilitate the consistent application of policy by the program office and the regions.

C. IMPLEMENTATION

1. All interactions with the regional offices examiner staff that require a formal interpretation of policy, practices, regulations, NUREGs, or other applicable directives, shall be documented on a Report on Interaction (ROI) Form (Attachment 1). The program office staff will not act on informal requests for interactions, such as telephone requests for policy interpretation. However, informal communications with the program office are appropriate to verify that an intended interaction is necessary, to establish a common understanding of the issue, or to solicit assistance in developing a suggested resolution. A telephone

request for an ROI number from the program office Operator Licensing Assistant (OLA) is also acceptable.

2. Individuals initiating interaction requests will check their respective branch files to prevent duplication, before forwarding the request to the program office. After the suggested resolution and proposed due date are worked out and have the concurrence of the regional Branch Chief as "Originator," a completed copy of the ROI should be forwarded to the program office. It should be electronically mailed to the program office OLA, who will log it in, and to the program office operator licensing Section Chief. The Section Chief will assign staff and inform the OLA, who enters the assignment in the ROI log.
3. Any interaction that requires interpretation of a regulation will be sent to the Office of the General Counsel (OGC), with the suggested resolution, for concurrence. The final resolution of these interactions will then be initiated by the responsible program office staff, commensurate with the OGC recommendation.
4. The program office OLA will maintain a record of all draft ROIs that have not received final resolution. Draft ROIs that have been sent to OGC for concurrence will be so recorded. The program office operator licensing Section Chief will periodically review this record to ensure that these interactions are finalized in a timely manner consistent with the proposed due date and that any associated follow-up actions are initiated.
5. Program office staff will work with the regional staff, as necessary, to facilitate final resolutions and to adjust the due date for any interactions that cannot be completed by the date proposed. In any case, the program office is responsible for documenting the final resolution for all interactions on the master file copy.
6. The program office operator licensing Branch Chief or Section Chief must approve the final action/resolution and distribution, including authorization to post any policy clarification or interpretation (generally in the form of a question and answer) on the operator licensing web site. Per ADM-200, Branch Chief approval is required if the issue involves procedural or programmatic guidance (e.g. a policy change, policy interpretation, new guidance, or significant change to current guidance). Otherwise, the Section Chief may approve the final action.
7. Final resolutions that require follow-up action, such as revision to NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," will be initiated and tracked by appropriate program office staff, designated by the Section Chief. NUREG revisions will be processed in accordance with OLMC-110, "Control of Operator Licensing Guidance Documents."
8. The program office secretary will e-mail the ADAMS accession number to each regional OLA when the ROI is final and has been placed in ADAMS.

9. The program office OLA will maintain a master file of all completed ROIs. They will be filed by year and by ROI number. The program office OLA will provide a monthly index electronically to the regional OLAs.
10. All regional operator licensing Branch Chiefs will ensure that their respective OLA maintains file copies of all completed ROIs.
11. To ensure that program office policy is consistently implemented, each regional file will be readily available to all operator licensing personnel attached to that region. It is each region's responsibility to keep their respective file current with the master file at the NRR program office.

D. DOCUMENTATION OF ROIs

1. All ROI Forms (Attachment 1) will be completely and legibly filled out by the person originating the request. Areas not applicable should be so marked.
2. Individuals initiating the interaction request, as well as program office staff charged with processing the request, will verify that the following minimum items are included on the ROI Form:
 - a. Interaction No.
 - b. Issue of concern is adequately described
 - c. Specific recommended action/resolution is offered
 - d. File Subject(s) is specified
 - e. Originator signature and date
3. The program office staff will fill out the final action/resolution, distribution and complete ADAMS Form 665. The program office Branch Chief or Section Chief will approve and date. The program office secretary will enter the ROI into ADAMS and provide the ADAMS accession number to the regional OLAs.

E. ATTACHMENT

1. Report on Interaction Form

Operator Licensing Report on Interaction (ROI)

Interaction No.:

Subject:			
From:		Date:	
To:		Proposed Due Date:	
Info.:			
<u>Background / Issue:</u>			
<u>Recommended Action / Resolution:</u>			
<u>Final Action / Resolution:</u>			
File Subject(s):	10CFR55:	NUREG-1021:	Specify Other:
Distribution:			Post on Web: Yes or No?
Signatures / Concurrences			
Regional OLBC:		Date:	
OGC:	(if needed)	Date:	
IOHS CH:		Date:	
IEHB CH:	(if needed)	Date:	