

REGIONAL OFFICE INTERACTIONS

A. PURPOSE

The purpose of this OLMC is 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* (10 CFR 55), are consistently implemented by all the regional offices.
2. Policy interpretations, applicable to the operator licensing process, are only made by NRC headquarters and are consistently implemented by all the regional offices.
3. Non-routine waiver requests, as described in ES-204 of NUREG 1021 shall be submitted to the program office for review and approval.

B. BACKGROUND

1. Pursuant to Section 36.b.(1) of ADM-200, "Delegation of Signature Authority," the branch chief of the operator licensing program office will provide "procedural and programmatic guidance" to the regions for examining, licensing and re-licensing power reactor operators and senior operators in accordance with 10 CFR 55. The program office is responsible for ensuring that the regional offices consistently implement the operator licensing process in accordance with established procedures and regulations.
2. Frequent interactions occur between the regional offices and the program office dealing with the interpretation of policy, guidance associated with applicant eligibility, and other aspects of the operator licensing process.
3. The formal Report on Interaction (ROI) system was established to document these interactions. This system includes an efficient and timely means of distribution and filing to minimize the loss or duplication of information. Furthermore, this system facilitates the consistent application of policy by the program office and the regional offices.

C. IMPLEMENTATION

1. All operator licensing interactions with the regional offices that require a formal interpretation of policies, practices, regulations, NUREGs, or other applicable directive shall be documented on an ROI Form (Attachment 1). Additionally, interactions such as non-routing waiver requests by license applicants, deferral of eligibility requirements or deviations of the requirements from NUREG 1021, shall be submitted to the program office for approval. The program office staff will not act on informal telephone or e-mail 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.

2. Individuals initiating interaction requests should check the Combined ROI Index in the Agency-Wide Documents Access and Management System (ADAMS) and review any previous relevant ROIs to prevent duplication, before contacting the program office's Operator Licensing Assistant (OLA) to request the next sequential ROI number. The ROI Combined Index and individual folders containing each year's ROIs are located in the ADAMS Program Manager under NRR/NRR-DIRS/IOLB/ROIs. The initiator must provide or attach sufficient background information for the program office to understand and resolve the issue. The initiator should also provide a suggested resolution and a reasonable proposed due date.
3. The regional Branch Chief must approve any ROI that originates in the region and forward a completed copy, electronic or hard copy, of the ROI to the program office. To expedite processing, the ROI and any supporting information should be electronically mailed to the program office OLA, who will log it in, and to the program office operator licensing Branch Chief. The Branch Chief will assign a staff member to review the ROI and inform the OLA, who will enter the assignment in the ROI log.
4. Any ROI resolution that involves an interpretation of a regulation will be sent to the operator licensing contact in the Office of the General Counsel (OGC) for concurrence. OGC may require a formal tasking memorandum before performing any work on the issue, and the expected response time for routine items can be lengthy. The responsible program office staff will coordinate the final resolution of these interactions commensurate with the OGC recommendation.
5. The program office OLA will maintain a record of all unresolved draft ROIs and those that have been sent to OGC for concurrence. The program office operator licensing Branch Chief will periodically review this record to ensure that ROIs are finalized in a timely manner consistent with the proposed due date and that any associated follow-up actions are initiated.
6. The program office staff will work with the regional staff, as necessary, to facilitate final resolutions and to adjust the due date for any ROI that cannot be completed by the date proposed. The regional office will generally request/obtain from the facility licensee any additional information that the program office staff needs to resolve an issue. The program office staff will document the final resolution for the ROI on the master file copy and enter the electronic file in ADAMS. Any ROI containing personal identifying information (PII) must be coded as "sensitive." All ROIs are designated as "non-publicly available."
7. The operator licensing program office Branch Chief must approve the final action/resolution and distribution of every ROI, including authorization to post any policy clarification or interpretation (generally in the form of a question and answer) on the operator licensing feedback web site (at <http://www.nrc.gov/reactors/operator-licensing/prog-feedback.html>). ROIs are internal documents and will generally not be placed in the public document room or posted directly on the web site; most ROIs are very specific in nature and do

not merit conversion and posting on the web site. Per ADM-200, Division Director approval is required if the issue involves policy guidance or programmatic direction (e.g., a policy change, policy interpretation, new guidance, or significant change to current guidance). Otherwise, the Branch Chief may approve the final action.

8. Final resolutions that require follow-up action, such as a revision to NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," will be reviewed and tracked by program office staff, as designated by the Branch Chief. NUREG revisions will be processed in accordance with OLMC-110, "Control of Operator Licensing Guidance Documents."
9. 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.
10. The program office OLA will maintain a master file of all completed ROIs. They will be filed by calendar year and by ROI number. The program office OLA will also update the Combined ROI Index in ADAMS on a quarterly basis.
11. All regional operator licensing Branch Chiefs will ensure that their respective OLA and examiners maintain access to the ADAMS file directory for completed ROIs. This will ensure that program office policy is consistently implemented and readily available to all operator licensing personnel attached to each region. Hard copies are not necessary if the files are readily accessible in ADAMS (e.g., in a folder/directory to which every examiner in the regional offices has viewer rights).

D. ATTACHMENT

1. Report on Interaction Form

06/2010		OPERATOR LICENSING REPORT ON INTERACTION (ROI)		Interaction No.:	
				Accession No.: ML	
Subject:					
Type of Action: (Check One)		Waiver:		Policy Interpretation:	
		Request for HQ Action:			
From:				Date:	
To:				Proposed Due Date:	
Additional Info.:					
<u>Background / Issue:</u>					
<u>Recommended Action/Resolution:</u>					
<u>Final Action/Resolution:</u>					
Distribution:		OLBCs, OLAs, ROI Logbook			
Signatures / Concurrences					
Regional OLBC:				Date:	
OGC:		(If needed)		Date:	
IOLB BC:				Date:	
DIRS DD:		(If needed)		Date:	
Distribution Completed by IOLB Secretary (Initials):				Date:	