NRC Management Directives

Web Assistance for MD Preparation, Editing, and Review

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Overview

Preparing Directives and Handbooks

Management Directives (MDs) are published by the Office of Administration (ADM), which manages the MD review process and ensures that new and revised MDs comply with system standards for content and presentation.

To produce MDs that are easy to read, logically organized, and contain accessible information, please follow these guidelines:

▸Directives

Directives state policy, assign major responsibilities to agency officials, and list delegations of authority. They should be concise and follow the prescribed format in MD 1.1, "NRC Management Directives System," that varies little among directives.

▸Areas of Special Importance

There are two key areas of special importance in drafting directives: specifying policy clearly and sharply focusing the scope of the responsibilities and authorities section.

Responsibilities and authorities should be limited to areas where agency officials fulfill major responsibilities, exercise discretionary authority, have influence over other agency officials, or may in their exercise of their authority subject themselves, other agency officials, or the agency to litigation. This section should not be so all-inclusive that it merely duplicates an official's position description in a functional area. This section covers the activities of division directors and above only.

▸Handbooks

Handbooks contain the system's "how to" procedural information and decision criteria to implement the policy stated in a directive. All policy in a handbook derives from a directive and must be identified by title and number with its directive. A handbook can be issued either with its directive or apart from its directive as a desk reference when it would be convenient to do so.

▸Make it Easy To Find Information

Handbooks are reference documents and should be organized and formatted to assist readers in locating information the first and subsequent times it is sought. They must contain minimal finding aids, such as a table of contents and easy-to-see headings, and may contain a subject index also. Their contents and organization vary widely, depending on their purpose and the scope of information covered. As a result, they usually present the greatest challenge to logical organization and clarity of expression.

Focus on Your Reader's Needs

The most effective way to meet this challenge is to keep the following guidance in mind as you outline and draft the handbook.

- Focus on the target audience for your handbook. Ask yourself: Who will actually use it? What will they use it for?
- Organize the information to highlight each task you want the staff to perform or each point they need to understand.

If your section or branch provides a service, first spell out the nature and scope of the service - what can the staff expect - before explaining the prescribed steps they must follow to obtain that service - how can they get it. If a statute, regulation, or guideline from another agency is crucial to the MD, do not incorporate it whole and undigested. Instead, redraft or summarize it to extract what readers are supposed to know about or do with the information. Use verbatim citations of such material sparingly.

Obtain Informal Reviews

The best way to check the effectiveness of your draft is to obtain comments from the point of view of people who will actually use your MD. Consider circulating the draft informally to a few people in this audience for review and comment. The goal of such review is to ensure that your reader is able to find the information he or she needs, that nothing important is left out, and that the writing is understandable. These readers can provide invaluable help in ferreting out explanations that need clarification, procedural steps that need to be improved or added, and material that is unnecessarily technical or that could be left out. (To the extent possible, give these reviewers the most complete draft available.) This process will enable you to submit the best draft possible to your office management for review. These reviews should also take place before the draft is submitted to the Rulemaking and Directives Branch (RDB) for editorial and format review and well before your draft MD is circulated to the agency at large for office-level review.

Obtain Editorial and Format Reviews

Before circulating the draft directive or handbook through the agency for office comments, it must be reviewed for editorial and format standards by RDB. Following this review, the RDB staff will discuss with you any proposed revisions and the process for obtaining comment and approval to issue the MD. The draft is then ready for circulation throughout the agency for office review.

Before changing a manual chapter/appendix to an MD or revising a current MD, first

1. Inform RDB (email Directives.Resource@nrc.gov). Before circulating the MD for office concurrence, submit the material to RDB for the following reviews:

- Format
- Organization

- Editing
- Compliance with requirements of the MD system

2. Following these reviews and preparation by RDB of the MD, submit the MD to NRC offices and regions for a **1-month (20 working days) review and comment period.**

- Please note that OIG is concerned when an office requests a compressed review period. The agency's major components will have a reduced opportunity to make substantive comments concerning the directive's content. Please review your author checklist and confirm that your MD timeline allocates sufficient time for MD review.

- MD 1.1 specifies a formal comment period of approximately 1 month but does permit offices to request shorter comment periods for minor changes or expedited handling. Your office must justify and defend its expedited review request (i.e., a compressed comment period).

3. Upon completion of the comment period—

- Resolve office comments

- Prepare a written resolution of the comments, if necessary (excluding resolution of editorial comments)

- Submit the marked-up MD, the written resolution of comments, and NRC Form 521,"Request for Publication of an NRC Management Directive," signed by the office director or designee, to RDB for processing

4. RDB then incorporates any changes requested by the originating office, completes NRC Form 522, "Approval for Issuance of a Directive or Handbook," and forwards the package containing the MD, the resolution of comments, and the NRC Form 521 for final concurrence. The concurrence chain always includes a final review by the Office of the General Counsel (OGC). The signature package will be routed to the appropriate approving official (e.g., the RDB Chief, Division of Administrative Services, Office of Administration; the Chief Financial Officer; the Executive Director for Operations (EDO); or the Chairman, in accordance with Handbook 1.1). If the MD is being issued by an office director exercising signature authority delegated by the EDO, the package will be routed back to originating office for final concurrence if either RDB or OGC requests changes to the draft submitted for publication under NRC Form 521.

5. Upon completion of the approval process, RDB prepares the directive transmittal sheet, enters the approval date on each page of the MD, enters the final MD into ADAMS, posts the PDF version to the online MD Catalog, requests public Web posting by the OIS Web Team, and notifies the staff by issuing an NRC Announcement.

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