

Comment Resolution for SA-121
Comments from NRC and Agreement States

OFFICE	DATE	LOCATION	COMMENT	RESPONSE
OGC / J. Olmstead	1/31/2013		No Comments	No Action
Region III / J. Lynch	2/27/2013		No Comments	No Action
		Section I. Introduction	Change the second sentence to read: "The MRB provides a senior-level management review of the Integrated Materials Performance Evaluation Program (IMPEP) review team's findings and recommendations."	Agree, procedure updated accordingly
Region I / M. Orendi		Section II. Objectives	Change A. to read: "To provide guidance to the Organization of Agreement States (OAS) on the coordination and participation of the Agreement State Liaisons in MRB meetings." Change B. to read: "To provide guidance to the Office of Federal and State Materials and Environmental Management Programs (FSME) staff on coordination of the Agreement State Liaisons to the MRB."	Agree, procedure updated accordingly
		Section III. Background	Change A. to read: "It is the policy of the NRC to evaluate the NRC's regional materials, sealed source and device (SS&D), and fuel cycle programs and Agreement State radiation control programs in an integrated manner. Guidelines for IMPEP..." Change B. to read: "The MRB makes the overall assessment of each NRC regional materials, SS&D, fuel cycle or Agreement State program on the basis of the findings and recommendations in the proposed final IMPEP report prepared by the IMPEP team that conducted the review. The guidelines for conducting MRB meetings and issuing findings for IMPEP reviews are outlined in FSME Procedure SA-106, <i>The Management Review Board</i> ."	Agree, procedure updated accordingly
		Section IV. Roles and Responsibilities	Change A. 1. to read: "Designates an OAS board member (OAS Designee) to be responsible for the coordination and participation of the Agreement State Liaisons." (Note: removed "with the IMPEP project manager" since IV. B. talks about this designee's roles and responsibilities) Unsure as to the meaning of the sentence in A.2. Suggest changing A. 2. to read: "Approves Agreement State Liaison recommendations once each volunteer has received their management's approval." Change B. 1. to read: "Compiles a list of interested Agreement State staff who meet the criteria to serve as a liaison to the MRB as listed in FSME Procedure SA-106 and coordinates an individual's participation with the IMPEP project manager;"	Agree, procedure updated accordingly
			Suggest removing B. 4. This has not been past practice for follow-up reviews. If the OAS wants to use the same liaison that was used for the IMPEP review that led to the follow-up then that should be the choice of the OAS board and should not be mandated by a procedure. Also the beginning of B. 4. is covered by B. 3.	Agree, procedure updated accordingly
			Change B. 5. to read: "Addresses any issues or concerns raised by the Agreement State liaison, as a result of participation on the MRB, with the IMPEP Project Manager; and"	Agree, procedure updated accordingly
			Suggest removing the newly added B.6. While we agree that if an Agreement State has concerns or feedback regarding an IMPEP review or members of the IMPEP review team they should communicate it through the OAS designee, we do not believe that this role and responsibility should be located in this procedure. This procedure is about the coordination and participation of the Agreement State Liaison to the MRB. This role and responsibility may be better suited for FSME Procedure SA-100 or SA-120.	Agree, procedure updated accordingly
			Change C. 1. to read: "Designates a point of contact for the OAS Designee; and"	Agree, procedure updated accordingly

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				Suggest removal of E. 3. It is very rare that an individual participating as the Agreement State Liaison to the MRB will cover more than 1 MRB in a given year let alone several MRB's. We believe that this role and responsibility is misleading and should be removed.	Agree, procedure updated accordingly
				Add a new entry that states: "Meets the requirements in FSME Procedure SA-106."	Agree, procedure updated accordingly
			Section V. Guidance	Change A. 2. to read: "Since the MRB schedule is coordinated with the Program being reviewed, the date will be established ..." (This change is requested to encompass not only NRC regional materials and Agreement State programs but also SS&D and fuel cycle program reviews)	Agree, procedure updated accordingly
				Remove "B.1." as there is only one item discussed in subsection B. Change subsection B to read: "The Agreement State Liaison to the MRB serves as a conduit for all Agreement States wishing to express thoughts or concerns about a particular IMPEP review for the MRB's consideration. The Agreement State Liaison should provide comments and feedback during the MRB meeting on behalf of the OAS and not a particular Agreement State."	Agree, procedure updated accordingly
				Suggest adding another point to V. A. regarding when the Agreement State Liaison can expect to receive the proposed final IMPEP report.	Agree, procedure updated accordingly
			Section VIII. ADAMS Reference Documents	This section needs to be added to this procedure.	Agree, procedure updated accordingly
			General Comment	Region I would like to recommend consideration of incorporating SA-121 into SA-106 (The Management Review Board). Since SA-106 already talks about the Agreement State Liaison to the Management Review Board and the Agreement State Liaison is part of the Management Review Board it is duplicative to have a separate procedure for that one position.	Appreciate comment however at this time no change will be made. Will consider incorporating SA-121 into either SA-106 or SA-100 when those procedures are revised.
FSME/DILR / T. Powell	2/12/2013		IV. B. The OAS Designee, Item 6	Editorial. Either remove "any" or make "issues" and "concerns" singular.	Appreciate comment however no change has been made
			IV. E. Individual Agreement State Liaison, Items 1-4	Item 1-3 are not parallel with the other sections describing roles and responsibilities.	Appreciate comment however no change has been made
				For item 2, who is encouraging the Agreement State Liaison for comments? This could be added to the roles and responsibilities for whichever position does this.	Appreciate comment however no change has been made
				Suggested edit to item 4 includes language to be more consistent with the roles and responsibilities for Agreement State Liaison defined in SA-106.	Appreciate comment however no change has been made
				The role of "OAS Liaison" is not mentioned elsewhere in the procedure. Is this the same as the OAS Designee? Or is this the same as the Agreement State Liaison? Or is this a different position?	Appreciate comment however no change has been made
Region IV / R. Erickson	2/27/2013		V. B. Liaison for IMPEP	No Comments	
			OFFICE	COMMENT	RESPONSE
Texas DSHS, B. Taylor	1/16/2013			It is difficult to tell if the terms "OAS Designee," "Agreement State Liaison," and "OAS Liaison" all refer to the same person/role or if they are different. The terms should be clearly defined and their use within the document double-checked to make sure they are used correctly	Agree, procedure updated accordingly
OAS, A. Jacobson	1/11/2013			The Issue Dates used throughout the document all have 2012 as the year. The Board recommends that be changed to 2013	Agree, procedure updated accordingly

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			The words "liaison" and "liaisons" are used throughout the procedure. The Board recommends that "liaison" and "liaisons" be used consistent as this procedure is referencing a single OAS to the Board	Agree, procedure updated accordingly
	IV. A.1		revise the sentences to read "Designates an OAS Board member to be responsible for the coordination and participation of the..."	Agree, procedure updated accordingly
	IV. A.2		The Board does not understand this statement and recommends this either be revised to provide clarification or deleted	Agree, procedure updated accordingly
	IV. B		revise to read "The OAS Board Designee"	Agree, procedure updated accordingly
	IV. B.4		revise to read "NRC regional"	Agree, procedure updated accordingly
	IV. B.6		was added to this procedure but discusses IM/PEP conduct. The Board recommends that SA-100 and SA-120 be revised to include this item instead of this procedure (SA-121)	Appreciate comment however at this time no change will be made. Will consider incorporating SA-121 into either SA-106 or SA-100 when those procedures are revised.
	IV. C.1		revise to read "OAS Board Designee"	Agree, procedure updated accordingly
	IV. D.1		revise to read "OAS Board Designee"	Agree, procedure updated accordingly
	V. A.2		revise to read "NRC regional and "OAS Board Designee"	Agree, procedure updated accordingly
	V. B		was added to this procedure but discusses IM/PEP conduct. The Board recommends that SA-100 and SA-120 be revised to include this item instead of this procedure (SA-121)	Appreciate comment however at this time no change will be made. Will consider incorporating SA-121 into either SA-106 or SA-100 when those procedures are revised.