



**Office of Nuclear Material Safety and Safeguards (NMSS)  
Procedure Approval**

***Format for NMSS Procedures  
AD-100***

---

Issue Date: **December 17, 2014**

Review Date: **December 17, 2017**

---

Laura A. Dudes, Director  
*Division of Material Safety,  
State, Tribal, and Rulemaking  
Programs*

***/RA P. Henderson for/***

***Date: 12/17/2014***

---

A. Duncan White, Branch Chief  
*Agreement State Program Branch  
Division of Material Safety,  
State, Tribal, and Rulemaking  
Programs*

***/RA/***

***Date: 12/16/2014***

---

Kathleen N. Schneider  
Procedure Contact  
*Division of Material Safety,  
State, Tribal, and Rulemaking  
Programs*

***/RA/***

***Date: 12/15/2014***

---

**ML14349A351**

***NOTE***

***Any changes to the procedure will be the responsibility of the NMSS Procedure Contact.  
Copies of the NMSS procedures are available through the NRC website.***



**Procedure Title:**  
***Format for NMSS Procedures***  
**Procedure Number: AD-100**

**Page: 1 of 5**  
**Issue Date:**  
**12/17/2014**

**I. INTRODUCTION**

This procedure establishes the format and content requirements for procedures previously incorporated into the Office of Federal and State Materials and Environmental Management Programs (FSME). On October 5, 2014, the functions of FSME were incorporated into the Office of Nuclear Material Safety and Safeguards (NMSS).

**II. OBJECTIVE**

To provide guidance to NMSS staff regarding the creation and update of standardized NMSS procedures that address State Agreement, State Liaison, and Tribal activities. A procedure categorization, numbering system, format outline, and content definition are addressed in this procedure.

**III. BACKGROUND**

Within NMSS, the Division of Material Safety, State, Tribal, and Rulemaking Programs (MSTR) has the responsibility previously shared between two FSME divisions for the external procedures. (See FSME Letter 14-095, issued October 3, 2014, for additional information on the organization of NMSS.)

The intent of NMSS procedures is to provide guidance for the implementation and coordination of all major office-related activities relating to State and Tribal interactions, a number of which are generally addressed in the U.S. Nuclear Regulatory Commission (NRC) Management Directives.

**IV. ROLES AND RESPONSIBILITIES**

- A. The Director of MSTR is responsible for review and approval of the appropriate procedures and revisions, as well as for assigning procedures to specific MSRT branches.
- B. The Branch Chiefs of MSTR are responsible for assigning staff as lead procedure contacts and for review and concurrence in procedures and revisions assigned to their branches. Branch Chiefs will approve procedures that pertain only to their branch and determine review dates for procedures.
- C. Each MSTR Procedure Contact is responsible for tracking and updating their assigned procedure(s). Additionally, each MSTR Procedure Contact should complete a review of their assigned procedure(s) within 3 months of the original

review due date and develop recommended changes to the procedure, as well as a schedule for completion, for MSTR management review and approval.

- D. The MSTR External Procedure Coordinator is responsible for providing interim procedure review to ensure overall coordination of the procedure update process and for tracking procedure status. The MSTR External Procedure Coordinator is responsible for ensuring inclusion of the final procedure on the NMSS external Home Page. The MSTR External Procedure Coordinator is also responsible for rescinding outdated procedures at the direction of MSTR management.

## **V. GUIDANCE**

- A. Each NMSS procedure will fall into one of the following categories, as noted in Appendix A: Administrative (AD), State Agreements (SA), State Liaison (SL), Tribal (TR), and Background (BK).
1. The content of procedures under AD, SA, SL, and TR will contain the following entries (followed by *Not Applicable*, where appropriate): Introduction, Objectives, Background, Roles and Responsibilities, Guidance, Appendices and References, and Agencywide Documents Access and Management System (ADAMS) Reference Documents, if applicable.
  2. Reviews and approvals will be covered under Roles and Responsibilities or in the Guidance sections.
  3. The content of procedures under BK will contain the following entries: Program Description, Statutory Authority, Regulatory Authority, and Policy Statements.
- B. NMSS procedures will use NRC standards for document preparation.
- C. The NMSS Procedure Manual Table of Contents will follow the example in Appendix B, and will include the current NMSS procedure number, title, date of issuance, and review date. The current web version of NMSS Procedure Manual Table of Contents can be found on the NMSS external Home Page.
- D. The first page of each procedure will be preceded by an approval sheet and will follow the appropriate example in Appendix C.
- E. The first page header for each procedure will follow the example contained herein to include the NRC seal, NMSS procedure title and number, page number, and issue date. Subsequent pages of each procedure will contain a modified header and include the procedure number and title, page number, and issue date.

- F. A Comment Resolution Document will be prepared, following the example in Appendix D, by the designated NMSS Procedure Contact, to show the disposition of procedure comments. This document will be included as background to the final procedures
- G. To avoid confusion that may result from single-page replacements, revised procedures are to be issued in their entirety.
- H. Lengthy, detailed procedures may benefit from the use of procedure-related handbooks. Handbooks become a permanent part of NMSS procedures and should be clearly marked and cited as appendices. Handbook format should follow the example in SA-300, Handbook on Nuclear Material Event Reporting in the Agreement States.
- I. Reviews
  - 1. Designated MSTR Procedure Contacts will review and revise assigned procedures, as needed. The designated MSTR Procedure Contacts will prepare a track change version of the document for the review and comment process. The cycle for review will be determined by the review date and will be not less than two years and not more than five years.
  - 2. The MSTR External Procedure Coordinator will provide interim procedure review and ensure overall coordination of the procedure update process.
  - 3. New procedures concerning the Agreement States, State Liaison and Tribal programs, or those procedures requiring significant revisions, will be distributed for review and comment to NMSS staff, Regional State Agreements Officers, Regional State Liaison Officers, affected NRC offices, and other persons designated by MSTR Division Director, NMSS (e.g., Agreement States).
  - 4. Designated MSTR Procedure Contacts will prepare a Comment Resolution Document only when comments are requested and received. The Comment Resolution Document will address reviewer comments and serve as background to the final procedures (See Appendix D). The Designated MSTR Procedure Contact will also prepare the final tracked changes version of the procedure from the previous revision to serve as background to the final procedure.

**J. Approvals**

1. NMSS procedures will have NMSS Procedure Approval sheets as cover pages (see Appendix C). Signatures on the approval sheet will include the MSTR Division Director, Branch Chief, and the MSTR Procedure Contact. The package will consist of Routing and Transmittal Slip (see Appendix E), the final version of the NMSS Procedure, tracked changes version, and Comment Resolution Document.
2. The issue date for a NMSS procedure should be within 30 days of the date the MSTR Division Director signs the NMSS Procedure Approval sheet. The revised procedure will be effective within 30 days of the issue date, at the discretion of the MSTR External Procedure Coordinator. During the review period, the currently approved version of the procedure is still in effect until the revised procedure is finalized.
3. Final NMSS Procedures, Tracked Changes Version of NMSS Procedures, and Comment Resolution Documents will be placed in ADAMS.
4. The final version of the NMSS Procedure, tracked changes version and Comment Resolution Document will be electronically available on the NMSS external Home Page. Notification of final versions of Procedures with significant impacts concerning the Agreement States and State Liaison programs will also be made to the appropriate State contacts.

**J. Previous FSME and STP procedures**

All previously issued FSME and Office of State and Tribal Program (STP) procedures are considered effectively NMSS procedures and remain in effect until they are reviewed and reissued with the issuance of this revision of AD-100. These procedures can be referenced as NMSS procedures with the issuance of this procedure even though the procedure still has FSME or STP title and references. These references should be considered to be NMSS or MSTR as appropriate within the title and the text of the procedure(s).

**VI. APPENDICES**

Appendix A - NMSS Procedure Manual Code Categories  
Appendix B - NMSS Procedure Manual Table of Contents  
Appendix C - NMSS Procedure Approval  
Appendix D - NMSS Sample Comment Resolution Document  
Appendix E - Routing and Transmittal Slip

**VII. REFERENCES**

NMSS Procedure SA-300, *Handbook on Nuclear Material Event Reporting in the Agreement States*

**VIII. ADAMS REFERENCE DOCUMENTS**

For knowledge management purposes, all previous revisions of this procedure, as well as associated correspondence with stakeholders, that have been entered into ADAMS are listed below.

<b>No.</b>	<b>Date</b>	<b>Document Title/Description</b>	<b>Accession Number</b>
1	05/31/2001	STP Procedure AD-100, Format for STP Procedures	ML011870278
2	11/20/2006	FSME Procedure AD-100, Format for FSME Procedures	ML070770002
3	02/11/2011	FSME Procedure AD-100, Format for FSME Procedures	ML110330161

# Appendix A

## NMSS Procedure Manual

### Code Categories

Code	Description
<b>BK</b>	<b>Background</b>
	100 NRC Agreement State Program Description Documentation
<b>SA</b>	<b>State Agreements</b>
	100 Integrated Materials Performance Evaluation Program (IMPEP)
	200 Compatibility Categories and Health and Safety Identification for NRC Regulations and Other Program Elements
	300 Reporting Material Events
	400 Management of Allegations
	500 Jurisdiction Determinations
	600 Training Criteria for Agreement State Personnel
	700 Processing a Request for an Agreement
	800 Providing NRC Predecisional Documents to Agreement States and Appropriate Working Groups of the Conference of Radiation Control Program Directors, Inc.
	900 Termination of Uranium Mill Licenses in Agreement States
	1000 Rescinded
	1100 Interactions with the Organization of Agreement State and Conference of Radiation Control Program Directors, Inc.
<b>SL</b>	<b>State Liaison</b>
	100 State, Local, and Tribal Government; and Organizational Liaison Program
	200 Updating List of Governors' Designees for Advance Notification of Nuclear Waste Shipments
<b>TR</b>	<b>Tribal</b>
<b>AD</b>	<b>Administrative Support</b>
	100 Format for NMSS Procedures
	200 Format for STC and RCPD Letters
	300 Reserved
	400 Rescinded
	500 Invitational Travel/Authorizations and Vouchers
	600 Integrated Materials Performance Evaluation Program (IMPEP) Staff Procedures
	700 Rescinded
	800 Communications Between NMSS/Regional Offices and the Agreement States
<b>TI</b>	000 Temporary Instruction

## Appendix B

### Office of Nuclear Material Safety and Safeguards (NMSS) Procedure Manual Table of Contents

Procedure Number	Subject	Issue Date	Review Date
<b><i>NMSS Program Background (BK) Series</i></b>			
BK-100	Program Description Documentation	08/08/14	08/08/17
<b><i>State Agreements (SA) Series</i></b>			
SA-100	Implementation of the Integrated Materials Performance Evaluation Program (IMPEP)	02/01/07	02/01/10
SA-101	Reviewing Common Performance Indicator, Status of Materials Inspection Program	07/23/07	07/23/10
SA-102	Reviewing Common Performance Indicator, Technical Quality of Inspections	07/23/07	07/23/10
SA-103	Reviewing Common Performance Indicator, Technical Staff and Training	03/05/10	03/05/13
SA-104	Reviewing Common Performance Indicator, Technical Quality of Licensing Actions	04/13/12	04/13/15
SA-105	Reviewing Common Performance Indicator, Technical Quality of Incident and Allegation Activities	02/18/10	02/18/13
SA-106	Management Review Board	03/04/11	03/04/14
SA-107	Reviewing Non-Common Performance Indicator, Compatibility Requirements	03/27/08	03/27/11
SA-108	Reviewing the Non-Common Performance Indicator, Sealed Source and Device Evaluation Program	01/22/10	01/22/13
SA-109	Reviewing the Non-Common Performance Indicator, Low-Level Radioactive Waste Disposal Program	01/22/10	01/22/13
SA-110	Reviewing the Non-Common Performance Indicator, Uranium Recovery Program	01/22/10	01/22/13
SA-111	Implementation of Management Directive 5.10, Formal Qualifications for IMPEP Team Members	02/22/07	02/22/10
SA-112	Emergency Suspension of Section 274b Agreement	03/04/11	03/04/14
SA-113	Placing an Agreement State on Probation	02/24/10	02/24/13
SA-114	Suspension of a Section 274b Agreement	03/09/11	03/09/14
SA-115	Termination of a Section 274b Agreement	09/25/07	09/25/10
SA-116	Periodic Meetings with Agreement States Between IMPEP Reviews	06/03/09	06/03/12



Procedure Number	Subject	Issue Date	Review Date
SA-117	Agreement State Project Officers (ASPOs)	Rescinded	
SA-118	Orientation Meeting for New Agreement States	03/19/10	03/19/13
SA-119	Follow-up IMPEP Reviews	08/24/12	08/24/15
SA-120	Agreement State Participation as IMPEP Team Members	05/04/10	05/04/13
SA-121	Agreement State Liaison to the Management Review Board	10/31/13	10/13/16
SA-122	Heightened Oversight and Monitoring	02/24/10	02/24/13
SA-123	Conducting Self-Assessments of the Integrated Materials Performance Evaluation Program	06/24/11	06/24/14
SA-200	Compatibility Categories and Health and Safety Identification for NRC Regulations and Other Program Elements	06/05/09	06/05/12
SA-201	Review of State Regulatory Requirements	07/27/07	07/27/10
SA-300	Reporting Material Events	03/27/13	03/27/16
SA-400	Management of Allegations	01/22/01	01/22/04
SA-500	Jurisdiction Determinations	09/25/07	09/25/10
SA-600	Training Criteria for Agreement State Personnel	03/16/11	03/16/14
SA-700	Processing an Agreement	07/19/07	07/19/10
SA-800	Providing NRC Predecisional Documents to Agreement States and Appropriate Working Groups of the Conference of Radiation Control Program Directors, Inc.	04/25/07	04/25/10
SA-900	Termination of Uranium Mill Licenses in Agreement States	05/17/10	05/17/13
SA-1000	Implementation of the Grant Program for Funding Assistance for Formerly Licensed Sites in Agreement States	Rescinded	
SA-1100	Annual Organization of Agreement State and Conference of Radiation Control Program Directors, Inc. Commission Briefing	12/18/03	12/18/06
SA-1101	Monthly U.S. Nuclear Regulatory Commission Organization of Agreement States Conference of Radiation Control Program Directors, Inc. Teleconference	09/13/13	09/13/16
<b><i>NMSS State Liaison (SL) Series</i></b>			
SL-100	Regional State Liaison Officers (RSLOs)	07/14/10	07/14/13
SL-200	Updating List of Governors' Designees for Advance Notification of Nuclear Waste Shipments	09/30/09	09/30/12
<b><i>NMSS Administrative Support (AD) Series</i></b>			

Procedure Number	Subject	Issue Date	Review Date
AD-100	Format for NMSS Procedures	12/17/14	12/17/17
AD-200	Format for STC and RCPD Letters	10/25/10	10/25/13
AD-300	Reserved		
AD-400	OSP Staff Training	Rescinded	
AD-500	Invitational Travel/Authorization and Vouchers	11/01/10	11/01/13
AD-600	Administrative Staff Support Under the Integrated Materials Performance Evaluation Program (IMPEP)	03/22/10	03/22/13
AD-700	STP Information Quality Guidelines	Rescinded	
AD-800	Communications Between NMSS/Regional Offices and the Agreement States	10/15/09	10/15/12
<b><i>NMSS Temporary Instruction (TI)</i></b>			
TI-001	Implementation of Increased Controls	03/28/06	03/27/07
TI-002	Integration of Increased Controls of the Integrated Materials Performance Evaluation Program (IMPEP)	03/28/06	03/28/07

## Appendix C



### **NMSS Procedure Approval** **(NMSS Procedure Title)** **(NMSS Procedure Number)**

---

Issue Date:

Review Date:

---

*Director, MSTR*

***Date:***

---

*Branch Chief, MSTR*

***Date:***

---

*Procedure Contact, MSTR*

***Date:***

---

**MLXXXXXXXXXX**

#### **NOTE**

***Any changes to the procedure will be the responsibility of the NMSS Procedure Contact. Copies of the NMSS procedures are available through the NRC website.***

# Appendix D

## Comment Resolution Document

### Summary of Comments Received on SA-XXX, *TITLE OF PROCEDURE*

#### I. Sent to the Agreement States for Comment: [Month, day, year] (STC-YY-XXX)

**Comments Dated:** [State Name], Date (letter)  
[State Name], Date (e-mail)  
[Other State Stakeholders, e.g., Organization of Agreement States (OAS)], Date (markup)

#### Response to/Resolution of Comments:

##### [State Name]

Comment 1: On page 1, item III, Background: "The authority for review of Agreement States ..." State should be plural.

Response: This correction will be made.

Comment 2: On page 2, item IV.B.1, Division Director, MSTR: The Division Director of MSTR also "assigns IMPEP Team Leader for Agreement State reviews."

Response: We agree with the intent of the comment and revise the procedure to include in the guidance that the Division Director, MSTR, approves the assignment of IMPEP team leaders for Agreement State reviews.

Comment 3: On page 4, item IV.I.1, IMPEP Team Member: Should be "Completes the review of assigned indicator(s) and writes corresponding section(s) of the IMPEP report;" to avoid singular/plural problem with subject (IMPEP Team Member) and double use of plural "their."

Response: This correction will be made.

Comment 5: On page 5, item V.A.2 and 3, Follow-up Reviews and Periodic Meetings with Agreement States Between IMPEP Reviews: References two NMSS Procedures that do not appear in the list of references on Page 23. Also, I did not find these procedures (SA-116 and SA-119) in my collection, nor did I find them (easily) at the NMSS web site. Have these been distributed to the Agreement States for review and comment? I must have missed them.

Response: SA -116, "Periodic Meetings with Agreement States Between IMPEP Reviews" is a reference that will be added to the list of references in the procedure. This document has been previously distributed to the Agreement States for review and comment and has been finalized. It is available on the NMSS web page under procedures. SA-119, "Follow-up Integrated Materials Performance Evaluation (IMPEP) Reviews" is a new procedure under development and is scheduled to be sent to the Agreement States for review in late FY YYYY and finalized in FY YYYY. We are also including this reference to the guidance, although the document is not yet available.

Comment 6: On page 5, item V.A.4, Special Meetings: Discusses "special meetings," providing some criteria for determining when to hold one, but does not indicate who makes the decision to do so.

Response: Item V.A.4.b. has been revised as follows:

A special meeting for a State or NRC Region may be scheduled upon request by NRC or when requested by the State or Region based on NRC's evaluation of the need for such a meeting.

**[State Name]**

Comment: I have read the draft NMSS Procedure SA-100, Implementation of the Integrated Materials Performance Evaluation Program and have no comments.

Response: No response is necessary.

**[Other State Stakeholders, e.g., Organization of Agreement States (OAS)]**

Comment 1: This document does not appear to include provisions for audits of NRC Headquarters such as the sealed source and device reviews. As the Department understands it, these are to be routine audits conducted under IMPEP. Please include these in the SA-100 procedure.

Response: At the present time, Management Directive (MD) 5.6 does not include reviews of NRC Headquarter functions. Although an IMPEP type review of the SS&D headquarters function was performed in 1999 using the guidance and procedures developed for the Agreement States and Regional reviews, current practice is to implement MD 5.6 as written. When the results of the SS&D working group and re-engineering of the SS&D program are available, staff will revisit this issue. There will be no change to the procedure based on this comment.

Comment 2: In Section V(C)(2), page 7, if this is a process involving a partnership in the audit of regulatory programs, the option of including additional Agreement State personnel on review teams should be provided, particularly for sealed source and device reviews of NRC.

Response: We will revise this section to allow flexibility in the number of IMPEP team members including additional Agreement State personnel based on the individual State or Region.

**II. Sent to the NRC Offices for Comment: [Month, Day, Year]**

**Comments Dated:** Region [X], Date (e-mail)  
[NRC office, e.g., OGC], Date (e-mail)

**Region [X]**

Comment 1: On page 2, item IV.D, Senior Project Manager for IMPEP Coordination: Duties should also include staffing of IMPEP reviews and provide refresher and initial training for IMPEP members.

Response: We agree with this comment and will revise the guidance accordingly.

Comment 2: On page 6, item V.C.2, Routine IMPEP Reviews: Staffing for Agreement State reviews is normally three (for smaller States) or four (for larger States). Additionally, throughout the document, references to Regional NMSS should be changed to "Region or NRC Region."

Response: We agree with this comment and will revise the procedure to indicate there is flexibility in the number of team members, depending on the size of the program. The procedure will be revised to change Regional NMSS to Region.

**[NRC office, e.g., OGC]**

Comment: In Section IV(I), page 4, include additional duties of IMPEP team members such as interviews with appropriate staff and inspection accompaniments.

Response: The procedure notes that the IMPEP team member "Conducts the review of all indicators in accordance with the applicable NMSS procedures" and does not repeat the detailed information, which includes guidance on interviews and inspector accompaniments found in SA-101 through SA-105. There will be no change to the procedure based on this comment.

## Appendix E

### ROUTING AND TRANSMITTAL SLIP OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

NAME	INITIALS	DATE
MSTR Procedure Contact Name, Branch		MM/DD/YYYY
MSTR External Procedure Coordinator Name, Branch, Division		MM/DD/YYYY
Branch Chief Name, Branch		MM/DD/YYYY
Editor, NMSS		MM/DD/YYYY
Deputy Director, MSTR		MM/DD/YYYY
Director, MSTR		MM/DD/YYYY

\*\*\*\*\*

WITS/EDATS/NMSS TICKET NO(s): None

DUE TO DIVISION:      **Request signature by Director, MSTR by [Date]**

DUE TO NMSS:          N/A

\*\*\*\*\*

REMARKS:    **NMSS Procedure XX-NNN, [Procedure Name]**

\*\*\*\*\*

**ADAMS:          MLXXXXXXXXX (Pkg)**

\*\*\*\*\*

**Reminders (check if included):**

  x      ADAMS Form 665 **must** be attached to all packages if the document(s) are placed in ADAMS and are being provided to the NMSS Front Office for concurrence and/or signature.

          NMSS Front Office Group **must** be given [owner] rights to the document(s) in ADAMS that are being provided to the NMSS Front Office for concurrence and/or signature.

\*\*\*\*\*

MSTR External Procedure Coordinator: [Name]                      PHONE: xxx-xxx-xxxx

**\*Return to MSTR External Procedure Coordinator for Distribution\***

\*\*\*\*\*