

NTTAA Report to NIST

Title: Nuclear Regulatory Commission (NRC) Fiscal Year 2015 Agency Report

1. Please describe the importance of standards in the achievement of your agency's mission, how your agency uses standards to deliver its primary services in support of its mission, and provide any examples or case studies of standards success. Please include relevant Internet links and links to your agency's standards website.

It is the policy of the U.S. Nuclear Regulatory Commission (NRC) to increase the involvement of stakeholders in our regulatory development process and, consistent with the provisions of the National Technology Transfer and Advancement Act of 1995 (Public Law 104-113), to encourage NRC staff participation in the development of consensus standards in support of its mission. NRC involvement also encourages standards developing organizations (SDOs) to develop codes, standards, and guides that can be endorsed by the NRC and implemented by the industry, and increases the likelihood that the standards that SDOs develop will meet both public and private sector needs.

The NRC uses voluntary consensus standards (VCSs) as a key part of our regulatory framework. Some standards are incorporated by reference into NRC regulations. NRC's regulations may be found at: <http://www.nrc.gov/reading-rm/doc-collections/cfr/>. The NRC staff also issues documents providing guidance on acceptable methods for complying with NRC regulations, such as Regulatory Guides. These guidance documents frequently reference consensus standards as acceptable methods for compliance with NRC regulations. Regulatory Guides are cataloged here: <http://www.nrc.gov/reading-rm/doc-collections/#reg>.

The NRC's reasons for using standards include providing regulations and guidance of high technical quality, improving efficiency and transparency, providing the level of regulatory certainty and predictability desired by stakeholders, and accessing the broad range of technical expertise and experience of the individuals who are represented on many consensus standards organizations. Participation in standards development minimizes the expenditure of NRC resources that would otherwise be necessary to develop regulations and guidance that provide the technical depth and level of detail of consensus standards.

The NRC intends to continue participating in interagency cooperative efforts to close technical and regulatory gaps through development and application of consensus standards. Standards continue to provide a critical element in our safety mission. For more information, the NRC website on standards development is at: <http://www.nrc.gov/about-nrc/regulatory/standards-dev.html>.

2. Please list the government-unique standards your agency used in lieu of voluntary consensus standards during FY 2015.

Ans.: 2

1. Government Unique Standard: NRC NUREG-1556, "Consolidated Guidance about Materials Licenses" (Incorporated: 2011)

Voluntary Standard

American National Standards Institute (ANSI) N 13.2-1969, "Guide for Administrative Practices in Radiation Monitoring"

Rationale

(ANSI) N 13.2-1969, "Guide for Administrative Practices in Radiation Monitoring," had been endorsed in Regulatory Guide 8.2, with the same title, issued in February, 1973. The standard has not been revised since its inception, and it now refers to obsolete technical practices and outdated requirements. Therefore, Revision 1 of RG 8.2, published in May, 2011, removed endorsement of ANSI N 13.2-1969. Guidance is now provided through two referenced NRC reports, which could be considered Government-unique standards: NUREG-1556, "Consolidated Guidance about Materials Licenses," and NUREG-1736, "Consolidated Guidance: 10 CFR Part 20—Standards for Protection against Radiation."

2. Government Unique Standard: NRC NUREG-1736, "Consolidated Guidance: 10 CFR Part 20—Standards for Protection against Radiation" (Incorporated: 2011)

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3. Please list the VCS your agency substituted for GUS in FY 2015 as a result of review under Section 15(b)(7) of OMB Circular A-119.

Ans.: 0

4. Please provide the total number of VCS your agency BEGAN to use during FY 2015. Optional: If possible, also please provide the total number of private sector non-consensus standards your agency began to use during FY 2015. In addition, please provide your agency's rationale for the non-consensus standards reported in this question.

Ans.: Voluntary Consensus Standards: 12

VCSs Used in Regulation:

None

VCSs Used in Regulatory Guidance:

1. ASTM International (ASTM) C390-08 (Reapproved 2013), "Standard Practice for Sampling and Acceptance of Thermal Insulation Lots," was endorsed in Revision 1 of Regulatory Guide (RG) 1.36, "Nonmetallic Thermal Insulation for Austenitic Stainless Steel," in May, 2015.
2. ASTM C692-13, "Standard Test Method for Evaluating the Influence of Thermal Insulation on External Stress Corrosion Cracking Tendency of Austenitic Stainless Steel," was endorsed in Revision 1 of RG 1.36 in May, 2015.

3. ASTM C795-08 (Reapproved 2013), "Standard Specification for Thermal Insulation for Use in Contact with Austenitic Stainless Steel," was endorsed in Revision 1 of RG 1.36 in May, 2015.
4. ASTM C871-11, "Standard Test Methods for Chemical Analysis of Thermal Insulation Materials for Leachable Chloride, Fluoride, Silicate, and Sodium Ions," was endorsed in Revision 1 of RG 1.36 in May, 2015.
5. ASTM D2487-11, "Standard Classification of Soils for Engineering Purposes (Unified Soil Classification System)," was endorsed in Revision 3 of RG 1.138, "Laboratory Investigations of Soils and Rocks for Engineering Analysis and Design of Nuclear Power Plants," in December, 2014.
6. ASTM D2488-09a, "Standard Practice for Description and Identification of Soils (Visual-Manual Procedure)," was endorsed in Revision 3 of RG 1.138 in December, 2014.
7. ASTM D3740-12a, "Standard Practice for Minimum Requirements for Agencies Engaged in Testing and/or Inspection of Soil and Rock as Used in Engineering Design and Construction," was endorsed in Revision 3 of RG 1.138 in December, 2014.
8. ASTM D4015-07, "Standard Test Methods for Modulus and Damping of Soils by the Resonant-Column Method," was endorsed in Revision 3 of RG 1.138 in December, 2014.
9. ASTM D4220/D4220M-14, "Standard Practices for Preserving and Transporting Soil Samples," was endorsed in Revision 3 of RG 1.138 in December, 2014.
10. ASTM D4452-06, "Standard Methods for X-Ray Radiography of Soil Samples," was endorsed in Revision 3 of RG 1.138 in December, 2014.
11. ASTM D4753-07, "Standard Specification for Evaluating, Selecting, and Specifying Balances and Scales for Use in Soil, Rock, and Construction Materials Testing," was endorsed in Revision 3 of RG 1.138 in December, 2014.
12. ASTM D5878-08, "Standard Guide for Using Rock Mass Classification Systems for Engineering Purposes," was endorsed in Revision 3 of RG 1.138 in December, 2014.

Other Technical Standards: **0**

Rationale: N/A

5. Please enter the VCS Bodies in which your agency participated during FY 2015.

Ans.: **14**

<u>Voluntary Consensus Standards Body</u>	<u>Acronym</u>
American Concrete Institute	ACI
American Institute of Steel Construction	AISC
American National Standards Institute	ANSI
American Nuclear Society	ANS
American Society for Testing and Materials	ASTM
American Society of Civil Engineers	ASCE
American Society of Mechanical Engineers	ASME
American Welding Society	AWS
Health Physics Society	HPS
Institute of Electrical and Electronic Engineers	IEEE
Institute of Nuclear Materials Management	INMM
International Society of Automation	ISA
National Association of Corrosion Engineers	NACE
National Fire Protection Association	NFPA

6. Please provide the total number of your agency's representatives who participated in VCS activities and the total number of activities in which these agency representatives participated during FY 2015.

Ans.:

Agency Representatives: **204**

Activities: **460**

7. Please provide any conformity assessment activities (as described in "Guidance on Federal Conformity Assessment Activities" found in the Federal Register, Volume 65, Number 155, dated August 10, 2000) in which your agency was involved in FY 2015.

Ans.: None

8. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes.

Ans.:

The NRC believes that the Circular provides appropriate direction and encouragement for federal agencies to develop internal agency-wide guidelines. The circular also provides sufficient and reasonable flexibility for each agency to make an independent determination regarding its participation on voluntary consensus bodies and use of developed standards.

The NRC is following the ongoing effort to review and revise Cir. A-119, and we have provided agency comments during the process. At this time, we do not foresee significant effects on NRC processes as a result of proposed changes to the Circular. A concurrent action by the Office of Federal Register to revise its requirements for incorporation by reference, and particularly to require agencies to document their efforts to make standards incorporated by reference “reasonably available” to the public, has caused some delays in NRC rulemaking activities. Our procedures are being revised to comply with the new requirements, while we continue parallel efforts to enhance transparency and stakeholder participation.

9. Please provide any other comments you would like to share on behalf of your agency.

Ans.: No comment

10. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

10-1. Question removed by NIST

10-2. Question removed by NIST

10-3. Question removed by NIST

10-4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes)? (a) Yes; (b) No; (c) Not applicable.

Ans.: **(a) Yes**

10-5. Does your agency report use of standards from non-ANSI accredited standards developers, industry consortia groups, or both? (a) non-ANSI Accredited; (b) Consortia; (c) Both; (d) Neither; or (e) Not applicable.

Ans.: **(d) Neither**

10-6. Does your agency have a schedule for periodically reviewing its use of standards for purposes of updating such use? (a) Yes; (b) No

Ans.: **(a) Yes**

10-7. How often does your agency review its standards for purposes of updating such use? [Enter the number of years]

Ans.: **5**

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