

NRC Participation in the Development and Use of Consensus Standards

NRC Standards Forum
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Management Directive

6.5

- Federal law requires Government staff to use consensus standards where possible
 - National Technology Transfer and Advancement Act of 1995
 - Office of Management and Budget (OMB) Circular A-119
- MD 6.5, “NRC Participation in the Development and Use of Consensus Standards” (MD 6.5)
 - Provides direction for implementing the Act of 1995 (Public Law 104-113) and OMB Circular A-119

NRC's Use of Standards

- Endorsement of Standards
 - Rules - Incorporation by reference, principally in 10 CFR 50.55a, Codes and Standards (ASME, IEEE)
 - NRC regulatory documents
 - Regulatory Guides
 - Standard Review Plans
 - Inspection procedures
 - Generic communications
 - Safety evaluation reports
 - NUREGs
 - NRC may add exceptions or conditions to standards
- Note: standards may be referenced in documents vice endorsed

Endorsement Process

- The NRC staff will only endorse standards that support activities important to the NRC's regulatory activities
- Having NRC staff on committees is the most effective step in the path to getting a standard endorsed
- The SDO coordinators and NRC representatives are encouraged to identify early in the standards development processes where the standard might be endorsed or referenced (e.g., rule or regulatory guide)
- SDOs are encouraged to notify the NRC of new or revised standards
 - In the letters to the NRC, SDOs should include as much information as feasible to facilitate the NRC's endorsement decision process (e.g. endorsement of previous standard version, expected use by licensees, etc.)
 - NRC is constrained by resources in its response to requests for endorsement of standards in guidance documents

Endorsement Process (continued)

- Timing of a standard's possible endorsement controlled by several factors
 - Endorsement by rules may be controlled by the need for new or revised regulations;
 - Endorsement by regulatory document may be controlled by other needs to revise or create a new guidance document.
 - Otherwise, controlled by the agency's process for periodic review or updates of guidance documents
- When regulations or other NRC guidance are being created or revised
 - Staff typically considers endorsing the current version of the consensus standards

FY18 RG updates

- 10 RGs revised
- 2 RGs issued new
- 3 RGs withdrawn

Organization	Endorsed	Referenced
ASME	3	3
IEEE	1	6
ASTM		8
NFPA		43
ACI		1
ANS/ANSI		3
ANS/IEEE		1
ANS/ASME	2	1
ANSI/ASNT		1
NIRMA Tech guides		4
NEI	1	3

NRC Conditions

- NRC reserves the right to apply conditions, limitations, or modifications to the use of consensus standards when:
 - Consensus standards do not adequately address a specific regulatory issue
 - Standard is not sufficiently supported by relevant technical basis (e.g., data)
- The NRC will try to avoid imposing conditions by:
 - Discussing conditions with NRC Standards Steering Committee for standards of significant regulatory interest
 - Identifying concerns to stakeholders early in the standards development process
 - Offering stakeholders and the public opportunities to provide comments on proposed conditions during public comment periods

Prioritization Process of SDO Committee Activities Important to the NRC Mission



- Purpose is to help focus NRC resources, identify NRC interests and align with SDO activities
- Ranked list (High, Medium or Low) of standards activities important to the NRC's mission
- Key insights needed:
 - What the purpose of the new standard or the nature of the revisions to an existing SDO standard?
 - Why is this issuance or revision of the standard important to the NRC's mission?
 - When does the SDO anticipate publishing the new or revised standard?
 - What is the nominal date of the first anticipated use of this new or revised standard by an NRC applicant or licensee?

QUESTIONS?

