

***National Materials Program Working Group
Evaluation of National Materials Program Elements***

The Working Group identified and evaluated potential program elements required to support a “National Materials Program” as part of its initial evaluation process. Candidates for the group of program elements were selected by the Working Group based on current program elements common to NRC and Agreement State regulatory programs. The group used IMPEP and CRCPD guidance as a basis for identifying program elements. The following program elements were evaluated:

- Materials licensing, with particular focus on guidance governing the licensing process;
- Materials inspection, with particular focus on guidance governing the inspection process;
- Alternative options for States to perform licensing and inspection functions for all facilities within their respective State;
- Implementation of the materials inspection program;
- Implementation of the materials licensing program;
- Reciprocity, or the States’ and NRC’s process for allowing a materials licensee to conduct licensed operations in areas under another regulatory agency’s jurisdiction;
- Technical Guidance, with specific focus on procedural guidance for specific activities that may be used by licensees in support of their programs or license application submittals;
- Training, Qualification and Experience Standards for regulatory personnel;
- Regulatory program reviews;
- Regulatory program for general licensees;
- Rulemaking;
- (Complete list)

The process used by the Working Group included identification of existing processes or methods for accomplishing program goals within State and NRC regulatory programs, as well as other options for each program element. Additional options evaluated by the Working Group included, in some instances, elimination of the program element as well as alternatives for accomplishing the specified outcome. Each option, including the existing mechanisms, was evaluated against criteria defined in the Working Group’s Charter. These included:

- whether the option optimized resources of Federal, State, professional and industry organizations;
- whether the option recognized individual program needs and abilities;
- whether the option promoted consensus on regulatory priorities;
- whether the option promoted consistent exchange of information between regulatory programs;
- whether the option promoted harmonization of regulatory approaches; and
- whether the option recognized State and Federal needs for flexibility.

A summary of the options considered by the Working Group for each program element follows.

Materials Licensing Guidance

Options

1. No change from current. NRC develops licensing guidance for byproduct, source and special nuclear material licenses and requests input from Agreement States (AS), and AS also develop guidance for activities that NRC does not regulate and shares guidance with other States (CRCPD coordinates with States on some licensing guidance development).
2. NRC/AS jointly develop an agenda and priorities for developing licensing guidance and establish joint working groups to develop guidance.
3. NRC/AS jointly develop an agenda and priorities for developing licensing guidance and provide direction to an independent entity (CRCPD, ICRP, NCRP, HPS, professional organizations, etc.) that would develop the guidance documents.
4. No coordination between NRC and AS; NRC and individual AS develop guidance based on determined needs, including developing no guidance.
5. NRC/AS accept consensus standards for licensing guidance without further evaluation.

¹

	1	2	3	4	5	6
1- 0	0	0	0	0	0	0
2- +	+	+	+	+	+	0
3- +	+	+	+	+	+	0
4- -	0	-	-	-	-	0
5- +	+	0	+	0	0	0

Recommendations: NRC/AS jointly develop an agenda and priorities for developing licensing guidance. NRC/AS either use working groups to develop guidance or direct other organizations/entities to develop guidance when appropriate.

¹Columns represent evaluation criteria as follows: 1) optimizing Federal, State, professional and industry resources; 2) accounting for individual program needs and abilities; 3) promoting consensus on regulatory priorities; 4) promoting consistent exchange of information; 5) promoting harmonization of regulatory approaches; and 6) recognizing State and Federal needs for flexibility. Rows represent each option identified above. "0" means the option was rated equivalent to the existing method or option; "+" means the option was rated as an improvement for the specific criteria; and "-" means the option was rated as less desirable than the existing method or option.

Materials Inspection Guidance

Options

1. No change from current: NRC develops inspection guidance for its programs and AS develop guidance for their programs (recognizing that some States choose to adopt guidance in MC 2800).
2. NRC/AS jointly develop guidance and establish priorities for this work; joint working groups would be assigned the task of developing guidance.
3. NRC/AS jointly establish priorities for inspection guidance development and either accept available consensus standards (after revision or approval) or contract other organizations to develop guidance under NRC/AS direction.

2

	1	2	3	4	5	6
1- 0	0	0	0	0	0	0
2- +	0	+	+	+	+	0
3- +	0	+	+	+	+	0

Recommendation: NRC/AS should jointly establish priorities and develop inspection guidance. Joint working groups should be used to develop guidance. Alternatively, NRC/AS may also accept consensus standards (following review and revision, if needed) or contract with other organizations to develop guidance when available and needed.

²Columns represent evaluation criteria as follows: 1) optimizing Federal, State, professional and industry resources; 2) accounting for individual program needs and abilities; 3) promoting consensus on regulatory priorities; 4) promoting consistent exchange of information; 5) promoting harmonization of regulatory approaches; and 6) recognizing State and Federal needs for flexibility. Rows represent each option identified above. "0" means the option was rated equivalent to the existing method or option; "+" means the option was rated as an improvement for the specific criteria; and "-" means the option was rated as less desirable than the existing method or option.

**Materials Licensing and Inspection
Alternative for States to Perform Licensing and Inspection
for All Facilities Within Their Respective State**

Option:

1. No change from current. NRC regulates federal facilities and other entities (i.e., exempt distribution licensees) located within AS.
2. AS is granted statutory authority to perform licensing, inspection and enforcement for Federal facilities and other entities normally regulated by NRC (i.e., exempt distribution licensees and others).
3. AS are delegated authority (AS acts as NRC's agent) to perform licensing and inspection for Federal facilities and other entities normally regulated by NRC (i.e., exempt distribution licensees).

³

	1	2	3	4	5	6
1- 0	0	0	0	0	0	0
2- s	0	0	0	0	0	0
3- 0	0	0	0	0	0	0

Note: Option 2 was found to result in increased resource utilization for regulatory agencies since Master Materials Licensees, large broad-scope licensees and certain multi-site licensees (i.e., USDA and some U.S. Army facilities) would no longer perform permitting and inspection activities for their facilities.

Recommendation: The Working Group requires input from OGC regarding legal issues that may be associated with AS either being granted statutory authority or delegated authority to perform licensing, inspection and enforcement for Federal and other facilities normally regulated by NRC.

³Columns represent evaluation criteria as follows: 1) optimizing Federal, State, professional and industry resources; 2) accounting for individual program needs and abilities; 3) promoting consensus on regulatory priorities; 4) promoting consistent exchange of information; 5) promoting harmonization of regulatory approaches; and 6) recognizing State and Federal needs for flexibility. Rows represent each option identified above. "0" means the option was rated equivalent to the existing method or option; "+" means the option was rated as an improvement for the specific criteria; and "-" means the option was rated as less desirable than the existing method or option.

Performing Materials Inspections

Options:

1. No change from current. NRC performs inspections for all facilities authorized to possess/use AEA material in non-AS and at federal facilities in AS. NRC also performs inspections of general licensees and exempt distribution licensees located in non-AS and AS. AS inspect facilities located in their respective States under existing programs.
2. NRC performs all inspections of all licensees in non-AS and AS.
3. AS perform inspections of facilities licensed by the AS, as well as at facilities licensed by NRC within their respective States. (This option does not take into account any legislative changes required for AS to perform inspections of federal facilities.)
4. Maintain the current inspection program (Option 1) and allow other entities to contract to perform inspections and report back to the appropriate regulatory agency (i.e., NRC or AS, depending on facility).
5. Maintain the current inspection program (Option 1) and allow licensees to perform self-inspections/audits (in lieu of inspection by regulatory agency) and report results to appropriate regulatory agency. Licensee self-audits conducted in lieu of inspection by regulatory agency would be determined by regulatory agency.
6. Require all States (non-AS and existing AS) to perform inspections of all licensed facilities located within their respective State.
7. AS performs inspections of AS-licensed activities and NRC-licensed activities when conducting routine inspections of commercial/academic entities that hold AS and NRC licenses. (No change in licensing structure, so no legislative changes would be required.)
8. Accept inspections/audits performed by other organizations and use these inspections to supplement AS/NRC inspection programs. AS/NRC would be selective in accepting results of such inspections. This could narrow the scope of AS/NRC inspections. (Examples of these organizations include other regulatory agency inspections or professional/industry organizations.)
9. Maintain current inspection program and supplement with use of "Centers of Excellence" for performing inspections of specific technical areas. Centers of Excellence could be either AS or NRC organizations, and would be jointly recognized by AS/NRC.

Performing Materials Inspections (cont.)

4

	1	2	3	4	5	6
1- 0	0	0	0	0	0	0
2- -	-	-	S	-	-	-
3- +	-	-	0	-	-	-
4- +	+	0	0	-	+	+
5- +	+	0	0	0	+	+
6- -	-	0	0	0	-	-
7- +	0	0	+	0	0	0
8- +	+	0	0	0	+	+
9- +	+	0	+	0	+	+

Recommendations: Maintain the current inspection program, but supplement the existing program with other options. NRC would perform inspections for all facilities authorized to possess/ use AEA materials in non-AS and at federal facilities in AS. NRC would also perform inspections of general licensees and exempt distribution licensees located in non-AS and AS. AS would inspect facilities located in their respective states. Supplemental options would include: 1) allowing other entities to contract with NRC/AS to perform inspections and report results to the appropriate regulatory agency; 2) allowing licensees to perform self-audits which may be accepted in lieu of inspection by NRC/AS or reduce inspection effort by NRC/AS; 3) accept audits performed by other organizations and use these as a supplement to NRC/AS inspections to reduce inspection effort by NRC/AS; and 4) use “Centers of Excellence” to perform inspections of specific technical areas. Acceptance of licensee audits or audits performed by independent organizations to modify NRC/AS inspection effort would be determined by the appropriate regulatory agency in a selective manner. “Centers of Excellence” could be either AS or NRC organizations and would be jointly recognized by AS/NRC.

⁴Columns represent evaluation criteria as follows: 1) optimizing Federal, State, professional and industry resources; 2) accounting for individual program needs and abilities; 3) promoting consensus on regulatory priorities; 4) promoting consistent exchange of information; 5) promoting harmonization of regulatory approaches; and 6) recognizing State and Federal needs for flexibility. Rows represent each option identified above. “0” means the option was rated equivalent to the existing method or option; “+” means the option was rated as an improvement for the specific criteria; and “-“ means the option was rated as less desirable than the existing method or option.

Performing Materials Licensing

Options:

1. No change from current. NRC licensed AEA materials in non-AS, all federal facilities, exempt distribution, and SNM in greater than formula quantities. AS license AEA & NARM in AS and SNM in less than formula quantities.
2. *Place all program requirements in regulations; require only notification or registration of materials licensees (name, location, materials to be used).
3. Maintain current program and supplement with contracted entities to perform some license reviews or portions of reviews for specific technical areas.
4. *Licensees submit abbreviated license applications, indicating program commitments, and regulatory agencies review for completeness. This option would not require a detailed submittal of procedures to be used by the licensee.
5. *Maintain the existing license application process, but regulatory agencies perform administrative reviews for completeness, detailed reviews of licensee procedures would occur during inspections.
6. AS license all facilities within their State (would require change in legislation, but this was not considered for this program element evaluation).
7. NRC licenses all facilities using AEA material.
8. Maintain current program but supplement with "Centers of Excellence" that could be used to perform reviews of specific technical activities.
9. Establish "Centers of Excellence," consisting of AS/NRC organizations, that conduct all license reviews, based on expertise of each organization.

*Options 2, 4, and 5 were not evaluated further because they represent methods for performing materials licensing rather than organizations that may be assigned responsibility for materials licensing.

Performing Materials Licensing (cont.)

5

	1	2	3	4	5	6
1- 0	0	0	0	0	0	0
3- +	+	0	0	0	0	-
6- -	-	0	0	0	0	-
7- -	-	-	0	0	0	-
8- +	+	+	0	+	+	+
9- 0	0	0	0	+	+	S

Recommendations: Maintain the current program and enhance both NRC and AS reviews through use of contracted entities or “Centers of Excellence” to perform some license reviews or portions of reviews for specific technical areas.

⁵Columns represent evaluation criteria as follows: 1) optimizing Federal, State, professional and industry resources; 2) accounting for individual program needs and abilities; 3) promoting consensus on regulatory priorities; 4) promoting consistent exchange of information; 5) promoting harmonization of regulatory approaches; and 6) recognizing State and Federal needs for flexibility. Rows represent each option identified above. “0” means the option was rated equivalent to the existing method or option; “+” means the option was rated as an improvement for the specific criteria; and “-” means the option was rated as less desirable than the existing method or option.

Reciprocity

Options

1. No change from current: NRC/AS conduct inspections of licensees when working in respective jurisdictions, NRC may choose to conduct inspections at AS licensee's home office (to review activities conducted in areas under NRC jurisdiction), and reciprocity is required and limited to 180 days in any calendar year.
2. NRC/AS do not conduct inspections of licensees working under reciprocity in their respective areas of jurisdiction and instead contact the licensing/regulating agency to exchange inspection histories.
3. NRC/AS require that the licensee establish an office or record location within the respective area of jurisdiction.
4. NRC/AS contract with appropriate regulating agency to conduct inspection of activities conducted under another agency's jurisdiction.
5. Abandon reciprocal recognition of NRC/AS licenses by other regulating agencies and require that licensees seek a specific license if they choose to conduct licensable activities in areas under another agency's jurisdiction.
6. Do not limit activities conducted under the provisions of reciprocity to 180 days.
7. Defer this issue to another working group.

The Working Group solicited comments from State stakeholders on this issue since NRC is the only regulatory agency that enters another agency's domain to conduct inspections of licensees working under reciprocity. (Note: AS cannot enter another State to conduct inspections of AS or NRC licensees working within their State.) Based on comments received, the Working Group determined that a recommendation for change in this area was not warranted at this time. The Working Group's conclusion would not preclude examination of this process under a separate initiative.

Technical Guidance Documents

Note: Technical guidance documents refer to guidance developed for use by licensees and industry in meeting regulatory requirements. Such guidance may be adopted by licensees to support their program requirements or licensing requirements for both NRC and AS.

Options

1. No change from current. NRC and States develop such guidance or adopt guidance from Standards Development Organizations (SDOs), ICRP, NCRP, or allow licensees to propose guidance; regulatory agencies would review the documents to ensure that they meet agency/regulatory needs. IAEA or ISO guidance would also be considered.
2. Create a Technical Document clearinghouse for submission, evaluation and development of technical documents. The clearing house would publish the guidance in a catalog or comprehensive volume to make the guidance available to regulatory agencies. IAEA or ISO guidance would also be considered.
3. Allow SDOs to develop guidance and make the guidance available for use by regulatory agencies. (This option would not require acceptance review by NRC/AS.)
4. Contract development of guidance from SDOs based on NRC/AS needs.
5. NRC/AS develop guidance documents themselves.

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	1	2	3	4	5	6
1- 0	0	0	0	0	0	0
2- +	0	0	+	+	0	0
3+ / 0	-	-	-	-	-	S
4- +	0	+	+	+	0	0
5- -	+	-	-	-	-	+

Recommendation: Some organization would maintain a clearinghouse of technical documents evaluated and approved by the National Materials Program for use. Consensus on priorities, needs and recommendations for organizations to develop guidance should be jointly established by NRC/AS.

⁶Columns represent evaluation criteria as follows: 1) optimizing Federal, State, professional and industry resources; 2) accounting for individual program needs and abilities; 3) promoting consensus on regulatory priorities; 4) promoting consistent exchange of information; 5) promoting harmonization of regulatory approaches; and 6) recognizing State and Federal needs for flexibility. Rows represent each option identified above. "0" means the option was rated equivalent to the existing method or option; "+" means the option was rated as an improvement for the specific criteria; and "-" means the option was rated as less desirable than the existing method or option.

Training, Qualifications & Experience Standards for Regulatory Personnel

Options

1. No change from current. NRC staff is trained and qualified in accordance with MC 1246, and AS develop and train staff in accordance with their program requirements. NRC/OAS continue to develop training programs as an option for States to use. Adequacy of training would be developed during IMPEP reviews.
2. Create central organizations to conduct all training.
3. Maintain Option 1 and create a clearinghouse of training ideas, resources and opportunities designed for or employed by regulatory agencies.
4. Allow licensees to provide training, on a voluntary basis, for specific technical issues/activities. Alternatively, consider contracting with licensees to train regulatory staff in specific technical areas/activities if voluntary initiatives by licensees are not available.
5. Maintain Option 1 and encourage regulatory agency exchange program to develop staff in specific technical areas.
6. Have the NMP coordinate and establish priorities for training, with NRC paying for training to “ensure uniformity.” This was determined to be similar to Option 2 with regard to offering flexibility. In addition, it is based on an underlying assumption that by requiring one regulating agency to pay for all training, uniformity would be ensured because of contracting constraints and decisions made by a single agency.

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	1	2	3	4	5	6
1- 0	0	0	0	0	0	0
2- +	-	0	+	+	-	-
3- +	+	0	+	+	-	-
4- +	+	0	0	0	+	+
5- +	+	+	+	+	+	+
6- -	-	-	-	-	-	-

Recommendation: Maintain the current program and enhance with: 1) use of a clearinghouse of training ideas, resources and opportunities designed for or employed by NRC/AS; 2) allowing licensees to provide training, on a voluntary basis, for specific technical issues or consider contracting with licensees to train staff in specific technical areas; and 3) encourage a regulatory agency exchange program to develop staff in specific technical areas.

⁷Columns represent evaluation criteria as follows: 1) optimizing Federal, State, professional and industry resources; 2) accounting for individual program needs and abilities; 3) promoting consensus on regulatory priorities; 4) promoting consistent exchange of information; 5) promoting harmonization of regulatory approaches; and 6) recognizing State and Federal needs for flexibility. Rows represent each option identified above. “0” means the option was rated equivalent to the existing method or option; “+” means the option was rated as an improvement for the specific criteria; and “-“ means the option was rated as less desirable than the existing method or option.

Regulatory Program Reviews

Options

1. No change from current; maintain IMPEP reviews.
2. Eliminate IMPEP reviews and do not replace with alternative; rely upon individual programs to function effectively.
3. NRC/AS implement self-audit programs, evaluating performance against common defined criteria and report to a National Materials Program entity that would be empowered to require corrective action to address deficiencies.
4. NRC/AS implement self-audit programs, evaluating performance against common defined criteria and report to NRC, with NRC empowered to require corrective action to address deficiencies.
5. NRC/AS jointly perform regulatory program reviews more fully utilizing “Centers of Excellence” concept.
6. NRC performs audits of all regulatory programs.
7. NRC/AS contract with an independent entity to perform audits of regulatory programs with results reported to the National Materials Program entity.

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	1	2	3	4	5	6
1- 0	0	0	0	0	0	0
2- +	0	-	-	-	-	+
3- +	-	-	-	-	-	+
4- +	-	-	-	-	-	+
5- +	+	0	+	0	0	0
6- -	-	0	-	-	-	-
7- 0	-	-	-	-	-	-

Recommendation: Utilize team (NRC/AS) effort in conducting program reviews but fully implement use of “Centers of Excellence” to assist with team composition.

⁸Columns represent evaluation criteria as follows: 1) optimizing Federal, State, professional and industry resources; 2) accounting for individual program needs and abilities; 3) promoting consensus on regulatory priorities; 4) promoting consistent exchange of information; 5) promoting harmonization of regulatory approaches; and 6) recognizing State and Federal needs for flexibility. Rows represent each option identified above. “0” means the option was rated equivalent to the existing method or option; “+” means the option was rated as an improvement for the specific criteria; and “-“ means the option was rated as less desirable than the existing method or option.

Regulatory Program for General Licensees (Regulating Agency)

Note: This element refers only to the entity that would regulate general licensees and the general license program.

Options:

1. No Change from current. NRC and AS use different mechanisms for providing regulatory oversight for General Licensees, and the level of communication and contact with General Licensees varies widely among the existing regulatory programs.
2. Return the full General License program to the NRC.
3. Regulatory agencies require that manufacturers of generally licensed devices maintain information on entities that have received generally licensed devices. This would include maintaining current information on where the device is located, what entity possesses the device, and information regarding radionuclides and quantities in an entity's possession.
4. An independent entity could be used to track and monitor use of generally licensed devices for all AS and NRC.

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	1	2	3	4	5	6
1-0	0	0	0	0	0	0
2-+	-	0	-	+	-	
3-+	+	0	0	+	+	
4-+	+	0	+	+	+	

Recommendation: This needs to be examined concurrently with the following element. The Working Group recommends that this be discussed with the Steering Committee for consideration of whether a second working group should evaluate the General License program.

⁹Columns represent evaluation criteria as follows: 1) optimizing Federal, State, professional and industry resources; 2) accounting for individual program needs and abilities; 3) promoting consensus on regulatory priorities; 4) promoting consistent exchange of information; 5) promoting harmonization of regulatory approaches; and 6) recognizing State and Federal needs for flexibility. Rows represent each option identified above. "0" means the option was rated equivalent to the existing method or option; "+" means the option was rated as an improvement for the specific criteria; and "-" means the option was rated as less desirable than the existing method or option.

Regulatory Program for General Licensees (Implementation)

Note: This element refers only to how the general license program is implemented.

Options:

1. No Change from current. NRC and AS use different mechanisms for providing regulatory oversight for General Licensees, and the level of communication and contact with General Licensees varies widely among the existing regulatory programs.
2. Modify the regulatory program and make all generally licensed devices exempt from regulation.
3. Modify the regulatory program and make all generally licensed devices specifically licensed items.
4. Staff each agency (AS and NRC) sufficiently to implement a general licensee program (this does not consider pending implementation of the registration program for NRC).
5. Require the manufacturers, who are specifically licensed, to monitor and record the distribution and transfer of generally licensed devices and provide reports to the existing regulatory agencies for review.
6. Require that generally licensed devices be leased and not sold. This would result in the manufacturers retaining some responsibility.
7. Require that manufacturers identify their customers' locations as an additional location of use on the manufacturers' specific licenses. This would result in the manufacturers retaining some responsibility.

Recommendations: Some of the options were rated by the Working Group; however, given the discrepancies in how these items are regulated and the number of questions regarding the basis for authorizing distribution and use of generally licensed items, the Working Group elected to discuss this element with the Steering Committee. The Working Group is seeking advice on whether this issue should be reviewed by a separate group.

Certification Programs

Options:

Use G-34 Committee Certifying Entity process as an example (with minor modification) of how an element of a National Materials Program could work. Evaluate successes and problems identified by G-34 during initial implementation of the process, and document input received from G-34 with the working group's report.

Rulemaking

Options:

1. No change from current. NRC establishes rulemaking agenda, drafts the rule (with AS participation & input for some rules), establishes compatibility category and requires implementation. CRCPD working groups modify NRC rules to adapt for state use. CRCPD drafts rulemaking for non-AEA materials, and States usually adopt these rules. States may also draft rulemaking as needs are identified.
2. NRC/AS jointly develop a rulemaking agenda and establish a cooperative group to draft rules, using "Centers of Excellence" where possible .
3. NRC/AS jointly develop a rulemaking agenda, but NRC drafts rules.
4. NRC/AS jointly develop rulemaking agenda, but NRC and States draft rules independently.
5. NRC/AS jointly develop a rulemaking agenda, but an independent entity (NCRP,HPS,CRCPD) drafts rules for NRC and AS to adopt. (NMPWG determined that this would not optimize resources because of the complications involving contracting the entity.)
6. AS jointly develop a rulemaking agenda, and NRC and AS cooperate in drafting rules.
7. AS jointly develop a rulemaking agenda, and NRC drafts rules.
8. AS jointly develop a rulemaking agenda, and states draft rules independently.
9. AS jointly develop a rulemaking agenda, and an independent entity drafts rules for NRC and AS to adopt. (NMPWG determined that this would not optimize resources because of the complications involving contracting the entity.)

Rulemaking (cont.)

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	1	2	3	4	5	6
1-0	0	0	0	0	0	0
2-+	+	+	+	+	+	0
3-0	0	+	0	0	0	0
4--	+	+	-	-	+	+
5--	0	+	0	0	0	0
6-+	0	+	+	+	+	0
7-0	-	+	0	+	+	+
8-	+	+	-	-	+	+
9-	0	+	0	0	0	0

Recommendation: NRC/AS joint develop a rulemaking agenda and establish a cooperative group to draft rules, using “Centers of Excellence” where possible.

¹⁰Columns represent evaluation criteria as follows: 1) optimizing Federal, State, professional and industry resources; 2) accounting for individual program needs and abilities; 3) promoting consensus on regulatory priorities; 4) promoting consistent exchange of information; 5) promoting harmonization of regulatory approaches; and 6) recognizing State and Federal needs for flexibility. Rows represent each option identified above. “0” means the option was rated equivalent to the existing method or option; “+” means the option was rated as an improvement for the specific criteria; and “-” means the option was rated as less desirable than the existing method or option.

Information Infrastructure

Information Systems needed to support a Materials Program Nationally

- Incidents and Events
Used for identification of Generic Safety Issues and to track performance
- Number and Type of Licensees
Specific and General licensees
- Sealed Source and Device Registration Sheets
- Escalated Enforcement Actions
- Regulations
- Licensing and Inspection Guidance
- Radiography Certification Process
For both individual radiographers and States/Organizations approved for certification
- Directory Information
Identifying regulatory agencies, individuals and addresses
- Service Providers
Waste brokers, recycling organizations/facilities, and sealed source recovery services
- OSTP procedures
- Technical Guidance documents
- Program Information (such as provided in OSTP letters)
- Training Information (provided by NRC and other organizations)
- SNM database

Information Infrastructure (cont.)

Clearinghouse Information

(Information systems currently maintained which should have linked access through websites)

Information	Maintained By
Rulemaking	NRC, SSR & State
Radiography Certification (States/Organizations approved for certification)	OSTP
Sealed Source and Device Registration	NRC
Licensing and Inspection Guidance	NRC & State
Directory Information	HPS, CRCPD, STP
Services	CRCPD, some State
OSTP Procedures	STP, some States
Technical Guidance documents	NRC
Program Information	STP, NRC, States
Training	NRC, HPS, CRCPD, States

Proposals for National Databases

Incidents & Events
Escalated Enforcement
SNM database
Sealed Source and Device Registration