

Comment Resolution Document

Summary of Comments for *Interim SA-200, Compatibility Categories and Health and Safety Identification for NRC Regulations and Other Program Elements*

Sent to the Agreement States, NRC NMSS, NRC Regions I, III, and IV for Comment in STC-19-078, December 9, 2019

Comment No.	Source	Location	Comment	Accepted	Remarks
1	CO	Various	<p>It is quite difficult to piece together the actual list of Program elements and their compatibility. Especially when it comes to guidance documents and other non-regulatory program elements. The procedure suggests that they are listed in a table in appendix A but that has been deleted. It does however indicate that” A current section-by-section summary of the compatibility and health and safety categories of regulations in Title 10 of the CFR can be found on the NMSS website’s Regulation Toolbox¹” but there is no reference to non-regulatory program elements. A list of “AGREEMENT STATE PROGRAM ELEMENTS 2015- PRESENT” is found in the toolbox at: https://scp.nrc.gov/regulationtoolbox/Program_Elements_table.pdf</p> <p>However, these have an implementation date for AS for some items but none for others and does not indicate Compatibility category. Some of these have implementation due dates for those items that are compatibility D as described within the documents themselves. This is a mess. It is difficult at best to decipher the expectations of the NRC in regard to these.</p>	YES	<p>The Program Elements table previously listed as Appendix A can now be found on the website. It was revised to contain both regulatory and non-regulation program elements, to indicate the adequacy/compatibility category and give examples.</p> <p>Also another table listing regulation and non-regulation program elements that the Agreement states may need to implement depending on the compatibility category has been added to the same site. This table lists those documents issued to the Agreement State, their compatibility category and date of implementation, if applicable.</p>

					Even though certain items within the documents are a D compatibility; the overall procedure may be a C compatibility.
2	CO	General	While we understand that the revision and authoring of these procedures is a multi-organization process involving many individuals, when looking at the collection there seems to be a multitude of different voices and writing styles and as a result it lacks uniformity.	Yes	Efforts have been taken to address these differences.
3	CO	General	Specifically, it appears that many of the appendices address common items and it would be appropriate to use common titles for the appendices and to keep them in a common order if possible.	Yes	Please note that most of the appendices in the interim procedures (i.e., the "Examples of Less than Satisfactory Findings of Program Performance" from the common and non-common IMPEP performance indicators; the casework summary sheets, and inspector accompaniment summary sheets, will be posted on the IMPEP toolbox at: https://scp.nrc.gov/impeptools.html) have been removed and will be placed on the SCP Web site to allow for dynamic revisions.
4	CO	General	Additionally, during the drafting process the idea of consistency within these procedures regarding the phrase "Agreement State or NRC..." vs. "NRC or Agreement State..." was discussed. This should be made uniform throughout the procedures.	YES	Procedure revised accordingly.

5	NJ	General: Applies to all Interim SA procedures	Follow-up should be hyphenated.	Yes	Procedure revised accordingly.
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ADAMS ACCESSION NUMBERS

PACKAGE: ML20183A152

COMMENT RESOLUTION DOCUMENT: ML20184A179