



POLICY ISSUE

(Notation Vote)

September 12, 2024

SECY-24-0076

FOR: The Commissioners

FROM: Mirela Gavrilas, PhD
Executive Director for Operations

SUBJECT: INTEGRATED REGULATORY REVIEW SERVICE MISSION
SCOPING RESULTS AND RECOMMENDATION

PURPOSE:

This paper presents the results of the U.S. Nuclear Regulatory Commission (NRC) staff's evaluation of the options for hosting an Integrated Regulatory Review Service (IRRS) mission in the United States and seeks Commission approval of the staff's recommended option. This information is provided in response to the Commission's Staff Requirements Memorandum (SRM)-SECY-22-0044, "United States of America National Report for the Convention on Nuclear Safety," dated July 27, 2022 (Agencywide Documents Access and Management System Accession No. ML22208A199 – not publicly available).

SUMMARY:

In SRM-SECY-22-0044, the Commission directs the staff to perform a self-assessment and provide the results, along with recommendations, to the Commission. In response to the SRM, the staff evaluated options for a potential IRRS mission and identified four viable options and the associated resource needs. However, the options have different pros and cons, which are described below. In its evaluation, the staff considered several factors to assess the impact of hosting an IRRS mission, such as the required resources, potential impacts on major NRC mission work, and impacts on domestic regulatory partners. The staff also considered the potential benefits to be gained by hosting a mission, such as the chance to further the NRC's

CONTACT: Raeann M. Shane, NMSS
(301) 415-1200

Enclosure 5 transmitted herewith
contains Official Use Only -
Sensitive Internal Information. When
separated from Enclosure 5 this
transmittal document is decontrolled.

international leadership and relationships, the opportunity for the open exchange of information and expertise, and the prospect of continuous learning and knowledge management, as well as fostering increased public confidence.

While some of the potential benefits and costs of hosting a mission are intangible and thereby difficult to quantify (such as reputational risk and the lost opportunity to identify programmatic improvements), they were important factors considered by the staff along with the more quantifiable costs to agency resources. Based on its evaluation of the options identified, the staff recommends hosting an IRRS mission with a materials program scope. Accordingly, the staff requests the Commission's approval to start coordination with the U.S. Department of State to invite an IRRS mission to the United States, and to begin the needed planning effort.

BACKGROUND:

IRRS missions are part of an International Atomic Energy Agency (IAEA) program that helps Member States strengthen and enhance the effectiveness of their regulatory infrastructure for nuclear reactor safety, radioactive material safety, radioactive waste safety, and transportation safety. The IAEA IRRS program sends teams of specialized technical and regulatory experts to perform peer reviews of nuclear regulatory bodies around the world. Missions are conducted at the request of the host country and are organized into topical modules as shown in enclosure 1. However, independent of the scope of the mission, the host is required to evaluate core regulatory processes described in Modules 1–11. Countries have flexibility in scoping the regulatory activities and facilities that would be of most value for the country. The NRC hosted an IRRS mission in 2010 focusing on operating reactors. At that time, the NRC believed a full-scope mission would be too burdensome, and the agency would gain the most value from an operating reactor mission (excluding research reactors and exposures). In addition, the NRC supports IRRS missions as an important way to positively influence international nuclear safety and to gain insights that can improve the NRC's regulatory programs and processes.

In 2022, the Commission, in SRM-SECY-22-0044, directed the staff to consider hosting a near-term IRRS mission to peer review the NRC's regulatory framework, to perform an IRRS self-assessment, and to provide recommendations to the Commission by August 2024. The staff was further directed to respond as follows when addressing IRRS-related questions as part of the Joint Eighth and Ninth Convention on Nuclear Safety Review Meeting peer review process:

The United States believes that IRRS missions provide a valuable and useful independent review of regulatory authorities, as evidenced by our participation in numerous IRRS missions. The NRC staff intends to perform an IRRS self-assessment and provide the results, along with recommendations, to the Commission within the next two years. The Commission will determine its next steps with regard to a potential IRRS mission after reviewing the results of the self-assessment.

In a Commissioners' Assistants note dated June 15, 2023 (ML23130A296 – not publicly available), the staff affirmed that it would evaluate the options for hosting an IRRS mission in the United States and that it would provide the Commission with the results of this evaluation, the options, and a recommendation on hosting such a mission.

The scope of the 2010 U.S. IRRS mission did not include radiation sources, research and test reactors, fuel cycle facilities, radioactive waste management facilities, transportation, decommissioning, or exposure situations, which include occupational, medical, and public exposures. The mission used IRRS Modules 1 to 4 covering the essential elements of the legal framework for safety and Modules 5 to 9, which addressed the five main regulatory processes. The mission also included IRRS Modules 10 and 11, which focused on emergency preparedness and the interface with safety and security, respectively.

In advance of the 2010 mission, the NRC staff prepared substantial documentation as advance reference material (ARM) and completed a comprehensive self-assessment. The NRC hosted the mission with an international team of 20 safety experts for 2 weeks, primarily at NRC Headquarters and included visits to the Region I Office, Limerick Generating Station, and Salem Nuclear Generating Station.

The 2010 mission identified 2 recommendations, 20 suggestions, and 25 good practices. The report IAEA-NS-20140/02, "Integrated Regulatory Review Service (IRRS) Mission to the United States of America," published in 2010 (ML110630400), is available on the NRC's public website.

Because all IRRS missions require a follow-up mission, the NRC staff developed an action plan to address the team's findings and subsequently hosted a follow-up mission in 2014, with an international team of five safety experts. The purpose of the follow-up mission was to review the progress in addressing the findings of the original mission. As recommended by the IAEA Nuclear Safety Action Plan, special attention was given to regulatory implications to the U.S. framework for safety in relation to the lessons learned from the TEPCO Fukushima Dai-ichi accident. The follow-up mission closed 1 of the 2 recommendations and 19 of the 20 suggestions. The recommendation that was closed was to describe the organization-wide core process and support processes to confirm and document a fully integrated management system. The other recommendation pertained to the development of process maps to enable a periodic, holistic review of the effectiveness of the management system, and was completed on June 29, 2018 (ML17318A140 – non-publicly available). It also identified one new good practice and one new suggestion. The report IAEA-NS-2014/01, "Integrated Regulatory Review Service (IRRS) Follow-up Mission to the United States of America," published in 2014 (ML14265A068), is available on the NRC's public website. On April 13, 2016, the United States sent a letter to the IAEA that served as the final update on the 2010 and 2014 IRRS missions (ML16106A037). Enclosure 2 contains the complete list of recommendations, suggestions, and good practices for both the initial and follow-up missions.

Modernization of the IRRS Mission Program

Since the United States hosted the 2010 mission, the IAEA has conducted several workshops, attended by numerous Member States, on the overall IRRS process. These led to improvements in the program including the in-depth revision of the self-assessment questionnaires to increase the efficiency of the self-assessment process. This revision resulted in reducing the number of questions by 75 percent, establishing an online Good Performance Database, and making available on the IAEA website two e-learning courses for the IRRS teams. Despite these efficiencies, the self-assessment process is still a resource-intensive activity.

In October 2023, the IAEA held an IRRS Workshop in which participants (including NRC staff members) concluded that the IRRS review process had value for regulatory bodies and had

demonstrated improvements since the previous workshop conducted in 2018, although opportunities to enhance the efficiency and effectiveness of the process were identified.

To better understand changes made to the IRRS process, the NRC staff reached out to regulatory counterparts with a series of benchmarking questions regarding their recent experiences hosting IRRS missions. The countries selected for benchmarking were chosen because each had hosted a mission or follow-up mission within the past 5 years that was not their first mission. Based on the responses collected, there were several notable findings. Nearly all responders reported that the second (or subsequent) IRRS mission was equally, or more, resource intensive than the first mission. Several responders noted that material from prior self-assessments was not usable, or required substantial updating, because of significant changes to the IRRS self-assessment process, IAEA safety standards, or national regulations in the time elapsed since the last mission. Enclosure 3 provides additional details on the responses to the benchmarking questions.

DISCUSSION:

Options

Based on the scope of the 2010 IRRS mission and its follow-up mission in 2014, as well as the revised SARIS questions, the staff identified the following options for Commission consideration in deciding whether to host an IRRS mission:

1. Full Scope
- 2a. Reactors, including research and test reactors and exposure scenarios
- 2b. Reduced-Scope Reactors
3. Radioactive Materials
4. No Mission

The scope of each option is as follows.¹ Enclosure 4 discusses the benefits and disadvantages of each option.

1. Full-Scope Mission

This option considers conducting a full-scope mission, which would include all activities, facilities, and exposure scenarios under the NRC's Atomic Energy Act jurisdiction. Both the pre-mission activities and the mission itself would involve engaging those States that have regulatory jurisdiction over certain radioactive materials, referred to as Agreement States, as well as the NRC's Federal partners that share in the agency's mission to regulate the Nation's civilian use of radioactive materials.

¹ Though the IAEA does not have standards documents exclusively focused on advanced reactors, IAEA missions include a peer review of a regulatory body's current regulatory framework as applicable for small modular reactors (SMRs) and advanced reactors consistent with current IAEA standards. However, the recommendation is not to include SMRs or advanced reactors in any of the options. In addition, the staff would propose to not include accident tolerant fuel, advanced reactor fuels, reprocessing, new fuel type facilities and fusion in the scope of any of the options given the lack of specific standards for these areas and the agency's need to focus on strategies for effective licensing of these new technologies. Some of these topics (e.g., advanced reactors, fusion) could be included in policy discussions at the time of the actual mission.

2a. Reactor Mission

Under this option, the mission would review only the regulatory framework for safety of nuclear power plants. This option would include Modules 1–11; for the core processes (i.e., Modules 5–9), the IAEA mission would review nuclear power plants (large light-water reactors) and research reactors.

In addition, the IAEA mission would review exposure scenarios resulting in potential occupational and public doses associated with those facilities and activities (e.g., effluent releases).

This option would be similar to the scope of the 2010 mission.

2b. Reduced Scope Reactor Mission

Under this option the mission would focus on a more tailored scope to review the regulatory framework for safety of the operating nuclear power plants. This reduced-scope option would consider the operating reactor program but would tailor the mission to not include certain activities. Activities that would be excluded are research and test reactors, exposure scenarios, or aspects of the reactor program that have not changed since the 2010 review in the scope of the review. The staff would finalize the reduced reactor scope in coordination with the IAEA in a manner that would seek to mitigate the potential impacts to domestic priorities that would be associated with a mission that included reactors in the scope.

3. Radioactive Materials Mission

This option would focus on the regulatory program for radioactive materials but, as in the full-scope mission, include only those activities, facilities, and exposure scenarios under the NRC's Atomic Energy Act jurisdiction. These would include fuel cycle, decommissioning (both materials and reactor sites), radioactive waste management, byproduct material, spent fuel storage, and transportation. The scope would also include the exposure scenarios associated with occupational, medical, and public dose. Resources for this option would be similar to those for Option 2a, Reactor Mission.

4. No Mission

This option would be to not host an IRRS mission.

Options Considered and Not Included

The staff considered an option that would focus primarily on new technologies. This option would require performing a limited self-assessment focusing on new technologies for fuel cycle facilities (advanced fuels), radioactive waste management facilities (consolidated interim storage facilities), transportation (new canisters), decommissioning (new business model), nuclear power plants (small modular and advanced reactors, referred to as innovative reactors by the IAEA), and medical (new medical technologies). However, in further discussions, the IAEA explained that the IRRS mission is not designed to address a set of selected technologies but rather types of facilities, activities, and exposure situations ("IRRS Guidelines ANNEX 1.5.5 Module 5 to 9: Facilities, activities and exposure situations"). Therefore, the staff concluded that

this option would not be feasible because the scope represents a significant departure from what an IRRS mission is designed to be. Further, the IAEA standards are not limited to new technologies and therefore the IAEA can't limit the review to new technologies. Therefore, the IAEA staff indicated that it could not support such a mission.

Evaluation Methodology

To evaluate each option, the NRC staff considered several factors: benefits to the NRC's regulatory oversight program; the impact of the options on the NRC's international leadership; lessons learned from prior IRRS missions; potential impacts on domestic priorities; impact on licensees; coordination with regulatory (Federal, State, and Tribal) partners; other peer reviews under international convention obligations; significant regulatory updates in the past 10 years; and resources for conducting the self-assessment, developing the ARM, and hosting the mission, including travel costs. Several of these factors are qualitative, while others are more quantitative. Enclosure 4 lists the pros and cons identified for each option.

To estimate the resources needed for each option, including the resources for completing the mission preparation and the self-assessment, the staff examined the resources expended during the 2010 mission. Because the IAEA has simplified the self-assessment questions since the 2010 mission, many of the current self-assessment questions are very different than the previous self-assessment questions. Consequently, the information prepared for the 2010 self-assessment may not be easily reused in a future mission. To account for the changes to the self-assessment process, the staff worked to develop resource estimates for responding to the current self-assessment questions and used the resource information from the previous mission's self-assessment for comparison only. Then the staff estimated the rest of the resources needed for the pre-mission activities and the mission itself. Enclosure 5 shows the resources estimated to be necessary for both pre-mission activities and the conduct of the on-site portion of the mission.

In its evaluation of resources for the on-site portion of the mission, the staff made the following assumptions:

- For all options considered, the mission would last 2 weeks. This is the standard duration for all IRRS missions worldwide, regardless of program size or mission scope.
- In estimating the number of IAEA team members participating in a mission, for a full-scope mission, the staff estimated 3 to 4 more IAEA team members (peer reviewers) than the 20 team members that conducted the 2010 mission, based on the expertise needed for the mission. For a materials mission, the staff estimated one or two additional IAEA peer reviewers beyond those necessary for the 2010 mission to allow for extra expertise. For example, the IAEA team may need additional expertise to review medical and fuel cycle facilities and activities, as well as public and occupational doses. For a reactor-only mission, the staff considered the team size to be approximately the same as for the 2010 mission.
- The hosting member is responsible for the IAEA team's travel costs. The staff assumed that travel costs will be higher than costs for the 2010 mission to account for inflation and the possible increase in the size of the team.

- More NRC Headquarters staff may be needed for a full-scope mission than for the 2010 operating reactor mission to be available for a full-scope mission based on the need to prepare various activities and facilities, to prepare briefings, and to answer questions for the IAEA team.
- The IAEA team may request more site visits for either Option 1 or 4 (for example, fuel cycle facility, medical facility, waste disposal site) compared to the 2010 mission. The IAEA team may also want to meet with an Agreement State or the Organization of Agreement States (OAS) Board to learn their perspectives on the National Materials Program or visit an Agreement State site. For Option 2a, the IAEA peer reviewers may want to visit a research and test reactor site.

Based on these assumptions, the staff found that the resources needed to conduct the mandatory IAEA self-assessment and preparatory work (pre-mission activities) represents the biggest difference between the options identified.

Because the NRC does not have regulatory jurisdiction in certain areas that are included in the self-assessment, those areas are not recommended for inclusion in the proposed options for either a full-scope or materials only mission. These areas are facilities, activities, and exposure scenarios such as X-rays, fluoroscopy, radon in mines, naturally occurring radioactive materials (NORM) and exposures in space or during flight.

Coordination with Regulatory Partners

For a full-scope IRRS mission and a materials-focused mission, the NRC would have to coordinate with numerous Federal agencies and the Agreement States (see enclosure 6). Since the Agreement States and NRC are co-regulators, the NRC would have to describe the regulatory role of the Agreement States in both the pre-mission activities (self-assessment and ARM) as well as during the mission. Because of this co-regulator role, the NRC staff reached out to the OAS for feedback on whether the NRC should conduct an IRRS mission. The OAS Board met on April 4, 2024, to discuss the NRC hosting an IRRS mission. The Board felt that, because of the complex and robust nature of the U.S. system, participation would create an undue burden on Agreement State programs. The Board stated that the OAS will support the NRC in any decision, but it does not recommend participation. Mitigation measures to alleviate the burden are discussed below under the planning and implementation section.

Many modules in an IRRS mission have questions on programs that also pertain to the Federal agencies with which the NRC works to carry out its regulatory responsibilities, such as transportation, radiation sources, and radioactive waste management facilities, among others. The NRC staff informed these Federal agencies that an IRRS mission is an important opportunity to share experience and lessons learned on regulatory issues and to showcase and share the regulator's approach to safety with senior international counterparts. The staff walked representatives of these agencies through the process, including both pre-mission and mission activities, and explained the role of these agencies if the Commission approves an IRRS mission. For a materials-focused mission (to include byproduct material, fuel cycle, materials and reactor decommissioning, radioactive waste management, transportation, and spent fuel storage), the NRC would have to coordinate with the same number of State and Federal agencies as for a full-scope mission.

For a reactor-focused mission, the NRC would have to coordinate with fewer Federal agencies (e.g., the U.S. Department of Homeland Security, Federal Emergency Management Agency (FEMA), and U.S. Department of Energy) and would not have to coordinate with the Agreement States.

For all options, because the mission would include only activities under NRC jurisdiction, the staff would propose not to coordinate with Federal agencies that the NRC interacts with only occasionally (e.g., The National Aeronautics and Space Administration, Bureau of Indian Affairs (see enclosure 6)). However, as a courtesy, the NRC would inform these agencies that the United States is requesting an IRRS mission.

The NRC would engage its federal partners further once the Commission has decided on the scope of the mission to align necessary resources to conduct the self-assessment and the mission. To date, as discussed above, the staff has only informed them of the possibility of a mission.

Benefits and Potential Disadvantages

By hosting an IRRS mission, the NRC will benefit as follows:

- IAEA IRRS missions provide a valuable independent review. The mission is an opportunity for the NRC to identify and make improvements in its nuclear safety and security program through the self-assessment process and discussions with senior international counterparts and to share lessons learned.
- The mission is an opportunity for senior international counterparts to identify good practices for the host nation that can be shared with others.
- By hosting an IRRS mission, the U.S. Government affirms to the international community its leadership commitment to nuclear safety, encourages other countries to host an IRRS mission, and demonstrates that the NRC is a continuous learning organization, as well as an open and transparent regulator.
- The NRC can leverage the mission and self-assessment as a training and knowledge management tool for new staff, as well as cross-training for current staff.
- Public confidence could be enhanced by inviting an independent review of the NRC's regulatory programs.

Disadvantages of hosting a mission include the following:

- Resource costs.
- Potential that supporting a mission may cause some delays with the NRC's domestic work due to competing priorities of affected staff.
- Impact on Federal and State partners.

- Potential for re-reviewing aspects of the program that were reviewed during the 2010 mission and 2014 follow-up mission, which would expend resources and result in minimal benefit.

Timing of Mission

If the Commission directs the staff to request a mission, the staff will consider the timing of the mission (and pre-mission activities) within the budget cycle and the IAEA schedule. The IAEA guidelines state the following:

The initial request by the State is usually made 2–3 years in advance of the proposed date of the IRRS mission. As part of the preparation for an IRRS mission, the staff will develop the required ARM using responses to the IRRS self-assessment, Issues papers, a Strengths, Weaknesses, Opportunities, and Threats analysis along with recommendations and a summary report. This allows sufficient time to conduct the self-assessment and prepare for the IRRS mission.

The staff proposes to include resources for the IRRS mission activities in the first budget provided to the Commission after a Commission decision. This would also allow the staff sufficient time, depending on the option chosen, to work with other Federal and State agencies in terms of timing and budget. If the Commission decides on an option for a mission by April 2025, the staff will work with the Office of the Chief Financial Officer to propose in the fiscal year 2027 budget formulation the necessary resources to accomplish the mission. The following is a realistic estimate of the schedule if the Commission were to approve hosting a mission:

- The United States requests an IRRS mission—2027
- The United States conducts an IAEA IRRS self-assessment—2028
- The United States hosts an IRRS mission—2029

Because the NRC staff's workload is increasing (for example, in fusion, advanced fuels, and transportation), the staff recommends that the earliest the United States should request a mission would be 2027 for a materials-focused IRRS mission. The staff recommends the delay in order to ensure adequate staff capacity that is cross trained by staff with experience in the conduct of an IRRS mission. Further the staff could offer rotations for the timeframe for the preparation and conduct of the mission. The considerations included in the pros and cons, coupled with the significant external interest in making the NRC more efficient, and the increasing workload in areas such as power uprate and license renewal reviews, which is not expected to subside through 2030, could make diverting resources to support an IRRS mission that includes reactor facilities during the next few years an unacceptable risk to the reputation of the agency. Therefore, if the mission were to include reactors, the staff recommends that it be delayed even further to the early 2030s. Enclosure 5 (pros and cons) lists details of specific impacts.

Planning and Implementation Considerations

A generic schedule for the IRRS preparatory phase includes the following:

- Initial formal governmental request to the IAEA for the IRRS.

- Development of an agreement between the IAEA and the host country on the initial scope of the proposed IRRS.
- An information meeting on the IRRS process and self-assessment to be conducted by the host country.
- A preparatory meeting, usually conducted in the host country.
- Completion of a self-assessment by the host country.
- Initial identification of regulatory and policy issues by the IRRS team lead and host country.
- Completion of the ARM.

If the Commission directs the staff to proceed with requesting an IRRS mission, the staff will continue working on various factors that may impact implementation of the self-assessment and mission. These factors will require coordination internally among the program and regional offices, with external stakeholders, and with the IAEA. These factors may influence both the timing, breadth and depth of the review.

The factors include the following:

- Staff capacity: The staff will have to consider the state of its ongoing work to ensure that the NRC has the capacity to manage a mission with the right people with the right expertise with minimal impact on the ongoing NRC mission-related work. Staff members and managers with the required expertise need to be available to respond to questions (during both the self-assessment and the actual mission) without adversely impacting critical licensing activities. In addition, the staff is still evaluating the impact of the Accelerating Deployment of Versatile, Advanced Nuclear for Clean Energy (also known as ADVANCE) Act 2024.
- External coordination: The staff will work with the Agreement States, external Federal agencies, or both to determine their level of involvement. For example, for both the full-scope and the materials option, the staff will work with the Agreement States to determine if an individual State or the OAS Board will be identified to work with the NRC in preparing responses to the self-assessment and to participate in the mission. Alternatively, the NRC staff could prepare the responses to the self-assessment and send them to the Agreement States for review and approval to minimize the impact on the Agreement States. The Agreement States would not be involved if the Commission chooses the reactor mission, but the NRC would still have to work with some Federal agencies (e.g., FEMA) for the emergency response module. The NRC would also need to ensure that no additional Federal agencies should be included in either the pre-mission activities or the actual mission. In addition, the NRC staff would work with all Federal agencies identified as to their level of involvement based on budget.
- Issue papers: The purpose of issue papers is to explain the difference between the IAEA standards and NRC regulations and how the NRC regulations meet the intent of the IAEA standards and adequately protect public health and safety. The staff would develop issue papers, depending on the scope of the selected mission, on areas to include as low as reasonably achievable versus justification; cost benefit/backfit; periodic

safety reviews; International Conference on Radiation Protection/IAEA Basic Safety Standards/Methodology; significance determination process and findings for reactors; code of conduct; the NRC's regulatory relationship with Agreement States; and the practice of medicine. While not required by the IRRS program, investing resources in this activity will help to provide a consistent rationale and streamline the responses to self-assessment questions when these topics are raised. Issue papers will also help the staff prepare a focused and consistent message for interviews. They will also help the IAEA mission team better understand the NRC's approach before the mission begins.

- Security issues: The staff will also need to identify issues within the NRC's jurisdiction that would not be subject to review (e.g., issues related to Category I and II weapons-grade material). The staff would need to determine what information supporting the review is or can be made publicly available (this would exclude safeguards or classified material).

RESOURCES:

Enclosure 5 includes the resources necessary for each option. Future budget submissions will include the necessary resources to implement the Commission's decision.

RECOMMENDATION:

The staff believes that any of the options identified are viable. After looking at all the options considered, the staff aligned on hosting a full-scope or radioactive materials mission as being most advantageous to the NRC's relationship with the international community. The advantage of either of those options is that the United States has not conducted either mission previously, and having agency programs reviewed by an international team of experts could enhance public confidence. The disadvantage of hosting an IRRS mission is that it requires resources and, in some cases, may require diversion of experienced staff members who are engaged in priority agency work, at a time when the agency workload is increasing.

The staff recommends that the Commission approve hosting an IRRS mission focusing on materials activities, facilities, and exposure scenarios under the NRC's Atomic Energy Act jurisdiction. Although a full-scope mission is a viable option, the staff is not recommending this option at this time given the cons listed in enclosure 4. However, if the Commission approves a full-scope mission, the staff recommends that the Commission consider delaying the mission until the early 2030s because of the impacts discussed.

In addition, because the reactor program was reviewed in the 2010 mission with a follow-up mission in 2014, the staff considers reviewing this program again to be of slightly less value to the agency and the international community than hosting a materials mission.

The staff recommends that the Commission approve the following activities and direct the staff to:

- Begin the process of coordination with the U.S. Department of State to invite an IRRS mission to the United States.
- Conduct an IRRS self-assessment once IAEA schedules a mission focused on a materials scope (within the NRC's regulatory purview) mission.

- Prepare issue papers as part of the ARM.
- Conduct the mission a year following submittal of the ARM.

COORDINATION:

The Office of the General Counsel has reviewed this paper and has no legal objection. The Office of the Chief Financial Officer has reviewed this paper for resource implications and has no objection.



Mirela Gavrilas, PhD
Executive Director for Operations

Enclosures:

1. Modular Structure of IRRS mission
2. Recommendations, Suggestions,
and Good Practices from the 2010
IRRS missions
3. International Experience with IRRS
4. Pros and Cons of Options
5. IRRS Resources
6. External Regulatory Agency
Coordination

**SUBJECT: INTEGRATED REGULATORY REVIEW SERVICE MISSION SCOPING RESULTS
AND RECOMMENDATION DATED: September 12, 2024**

ADAMS Accession Nos.**ML24193A260 – PKG****ML24193A268 – Integrated Regulatory Review Service Mission Scoping Results
and Recommendation****ML24193A261 – Enclosure 1 - Modular Structure of IRRS Mission****ML24193A262 – Enclosure 2 - Recommendations, Suggestions, and Good Practices
from the 2010 IRRS Mission****ML24193A263 – Enclosure 3 - International Experience with IRRS****ML24193A265 – Enclosure 4 - Pros and Cons of Options****ML24193A267 – Enclosure 5 - IRRS Resources****ML24193A266 – Enclosure 6 - External Regulatory Agency Coordination**

OFFICE	NMSS	QTE	NMSS	NMSS	NRR	NSIR
NAME	THolahan	JDougherty	RShane	THolahan	AKock for AVeil	CErlanger
DATE	07/12/2024	7/26/2024	07/31/2024	7/31/2024	8/13/2024	8/13/2024
OFFICE	OCFO	OIP	RI	NMSS	OGC	OEDO
NAME	LYee	DSkeen	DCollins	JLubinski	TStokes	MGavrilas
DATE	8/08/2024	8/13/2024	8/13/2024	8/13/2024	8/23/2024	09/12/2024

OFFICIAL RECORD COPY