REPORT ON INTERACTION PROCESS

A. PURPOSE

The purpose of this operator licensing manual chapter (OLMC) is to establish a system for processing the interactions regarding operator licensing between the regional offices and the Office of Nuclear Reactor Regulation (NRR) such that the following criteria are met:

1. New policies or policy changes that affect the procedures and practices for examining, licensing and re-licensing power reactor operators and senior operators, pursuant to Part 55 of Title 10 of the *Code of Federal Regulations* (10 CFR 55), are consistently implemented by all the regional offices.

2. Policy interpretations applicable to the operator licensing (OL) process are only made by the program office in NRC headquarters, the Operator Licensing and Human Factors Branch (IOLB) and are consistently implemented by all the regional offices.

3. Non-routine deferral, excusal, and waiver requests, as described in NUREG 1021, shall be submitted to the program office for review and approval.

B. BACKGROUND

1. Pursuant to ADM-200, “Delegation of Signature Authority,” the branch chief of the OL program office will provide “response to requests from regions for support” for examining, licensing and re-licensing power reactor operators and senior operators in accordance with 10 CFR 55. The program office is responsible for ensuring that the regional offices consistently implement the OL process in accordance with established procedures and regulations.

2. Frequent interactions occur between the regional offices and the program office dealing with the interpretation of policy, guidance associated with applicant eligibility, and other aspects of the OL process.

3. The formal Report on Interaction (ROI) system was established to document these interactions and to assist in consistent implementation of program policy among the regional offices. This system includes an efficient and timely means of distribution and filing to minimize the loss or duplication of information. Furthermore, this system facilitates the consistent application of policy by the program office and the regional offices.

C. IMPLEMENTATION

1. Interactions requiring the ROI system:

   a. All OL interactions with the regional offices that require a formal interpretation of policies, practices, regulations, NUREGs, or other applicable directives, shall be documented and submitted to the program office on an ROI Form (Attachment 1).

   b. Interactions such as excusal and waiver requests by license applicants, deferrals of experience or eligibility requirements that are beyond the scope of the region to approve, as described in NUREG-1021.

      - During non-emergent situations, the program office staff will not provide a decision based on informal telephone or email requests for policy interpretation. However, informal communications with the program office are appropriate to verify that an intended interaction is necessary, to establish a common understanding of the issue, or to solicit assistance in developing a suggested resolution.

   c. NUREG-1021 identifies certain conditions or situations that require the regional office to consult the NRR OL program office. In these situations, the regional office should first contact the program office chief, or their designee, to discuss the specific situation. Typically, the result of the consultation with the program office for situations or conditions that are or will be performed in accordance with policies, practices, regulations, NUREGs, or other applicable directives may be documented with an email, with the consent of both the program office and the regional office and filed in the facility exam file and/or applicant's docket file, as applicable. An ROI may be needed if it is determined that the other criteria for an ROI are met (e.g., a or b, above).

2. General Guidance on initiating a ROI:

   a. The IOLB SharePoint ROI tracker is the main user interface for ROIs. The excel ROI tracker is automatically updated to reflect the SharePoint list and is to be used for reference only.

      - Do NOT manually update the excel ROI tracker. If there is an error in the content, notify IOLB staff to correct the SharePoint ROI tracker.

   b. Before drafting the ROI, check the yearly ROI Index on the IOLB SharePoint website and review any previously drafted ROIs to prevent duplication.

      - IOLB SharePoint ROI Index can be referenced at: ROI Indices
      - Individual folders containing each year's ROIs are found in the Agency-

Wide Documents Access and Management System (ADAMS) Main Library under **NRR/NRR-DRO/NRR-DRO/IOLB/ROIs**.

- If a previous ROI exists that answers the specific issue requiring program office interpretation, then consult that ROI for guidance. If all questions are still not answered for the current interpretation question, then submit a new ROI to the program office. (This does not apply for license waivers or deferrals as NUREG-1021 requires these to be approved by the program office. Previous ROIs concerning waivers or deferrals provide precedence, but they do not provide approval of future actions.)

- ROIs that are generated regarding an applicant's experience or eligibility should be sent to the program office prior to submittal of applicant's final application. This allows the program office sufficient time to prepare the ROI response. Once the final applications are received, and the experience/eligibility matches the stated conditions in the ROI, the program office will issue the final ROI.

- OL processes may require that Personally Identifiable Information (PII) is utilized. However, the ROI should NOT include PII to the maximum extent possible.

    - Redact all PII before submitting the ROI to the program office.

    - Do NOT enter PII into the ROI tracker. Contact the program office prior to submitting the ROI for instructions on how to provide the PII details directly.

    - Program office will evaluate the need to include PII with the ROI and provide additional guidance for ROI submittal.

c. Process for program office generated ROIs:

- Periodically, the program office will determine a need to provide information to the regions through a program office generated ROI.

- The individual initiator process for a program office generated ROI is similar to the individual process described above, with the following exceptions:

- The initiator of the ROI shall not provide input to the resolution process more than providing information in the "Recommended Action/Resolution" section of Attachment 1.

- OL program office branch chief cannot initiate an ROI. Program office staff will initiate the ROI.

- ROIs generated in the program office will be approved by the program office branch chief.

3. Roles and Responsibilities

   a. ROI Submitter

      - The initiator must provide or attach sufficient background information on Attachment 1 for the program office to understand and resolve the issue.

   b. Regional Operations Branch Chief

      - Review and approve regional ROI submittals.
      - Distribute finalized ROIs to regional OL staff.
      - Ensure that their respective operator licensing assistant (OLA) and examiners maintain access to the ADAMS file directory for completed ROIs. This will ensure that the NRC OL Program is consistently implemented, and applicable guidance and policies are readily available to all OL personnel attached to each region. Hard copies are not necessary if the files are readily accessible in ADAMS (e.g., in a folder/directory to which every examiner in the regional offices has viewer rights).

   c. Division of Reactor Oversight (DRO) Division Director

      - Per ADM-200, division director approval is required if the issue involves policy guidance or programmatic direction (e.g., a policy change, policy interpretation).

   d. Program Office Branch Chief

      - Review and assign program office staff for ROI submittals.
      - Review and approve final ROIs.
      - Ensures an update is performed for any policy clarification or interpretation (generally in the form of a question and answer) on the OL feedback web site: https://www.nrc.gov/reactors/operator-licensing/prog-feedback.html.
      - Final resolutions that require follow-up action, such as a revision to NUREG- 1021, "Operator Licensing Examination Standards for Power Reactors," will be reviewed and tracked by program office staff, as designated by the OL program office branch chief.

- The OL program office branch chief periodically reviews the ROI Index record to ensure that ROIs are finalized in a timely manner consistent with the proposed due dates and that any associated follow-up actions are initiated.

e. Program Office OLA

- Ensure ROI numbering within the tracker and indices are consistent. This includes updating ROI titles for revised ROIs (refer to Section 7).

- Update ROI Index with ADAMS accession number and date of dispatch received from the administrative assistant (AA).

f. Program Office Assigned Staff

- Completes the assigned ROI by the due date assigned by the OL BC.

- Routes the completed ROI to Office of the General Counsel (OGC), as required.

- Completes and processes the completed ROI and memo to the DRO tracker for e-concurrence.

g. Program Office AA

- The AA enters the approved ROI into ADAMS in accordance with Section C.6.

- Routes and processes the e-concurrence file for final routing.

- Distributes the ROI ADAMS Accession Number to all operator licensing branch chiefs and OLAs via email.

4. Initiating a ROI:

a. ROIs are generated through the 'Submit an ROI' link on the IOLB SharePoint Website.

- The Official IOLB ROI tracker can be found here: https://usnrc.sharepoint.com/teams/NRR-Operator-Licensing-Branch/Lists/ROI%20Tracker/AllItems.aspx

NOTE: · When revising an existing ROI, include "REVISION" in the Title/Subject (ref C.7)
· Do NOT include PII in the ROI tracker. Send PII directly to the program office staff.

b. The ROI initiator will submit an ROI by selecting 'Submit an ROI' on the IOLB SharePoint site and fill out the following sections:

- Title/Subject
- From/To
- Date Submitted
- Submitter's Supervisor
- Requested Due date
- Type of Action
- Background Information
- Recommended Action/Resolution
- Add an attachment, if applicable

c. Once submitted, the submitter will receive an automated email acknowledging the ROI submittal and that the ROI is now with the submitter's supervisor for approval.

d. The proposed ROI will be automatically sent to the submitter's supervisor listed on the ROI tracker via email (<flow-noreply@microsoft.com) requesting review and approval.

- The email contains two links:
  - The title of the ROI, which is a link to the proposed ROI for review and, if necessary, editing or adding comments to the ROI.
  - A link to approve or reject the ROI.

e. Once a submitted ROI is approved by the submitter's supervisor:

- An ROI number is automatically generated by the ROI tracker list.
- A Microsoft Teams Power Automate Card is sent to the OL Branch Chief.

f. The program office branch chief assigns a program office staff member to review the ROI as well as a proposed due date via the prompted Teams Card.

g. Upon program office branch chief assignment:

- An ROI template is auto populated with the information provided by the submitter, ROI Number, assigned staff and due date and saved for staff reference on the OL SharePoint site: Here:
- The program office staff member assigned to the ROI is notified via email of the assignment.

h. The program office staff reviews the ROI and works with the regional staff, as necessary, to facilitate final resolutions and to adjust the due date for any ROI that cannot be completed by the assigned date.

i. Upon completion of the ROI:

- The operator licensing program office branch chief approves the ROI.

- The program office staff routes the ROI with finalized resolution to OGC for no legal objection (NLO) review, as necessary (see Section 5).

  - When OGC approval is obtained, document approval on the concurrence block, annotated via email. Alternately, the ROI can be routed to OGC via the e-concurrence process.

- The assigned staff routes the approved ROI to the AA for final distribution. (See Section 6).

5. ROIs requiring OGC NLO:

a. Every ROI shall be provided to OGC for review unless the program office determines that OGC review is not warranted (for example, OGC has previously provided advice on another, similar ROI).

b. If such a determination is made, a justification for not providing the ROI to OGC must be provided. If there is any doubt, the ROI shall be provided to OGC.

c. Any ROI resolution that involves an interpretation of a regulation will be sent to the OL contact in the OGC for legal review (and subsequent NLO).

d. The OL program office staff is to send proposed ROIs to OGC via the following form: OGC Work Request

e. OGC review is not limited to interpretation of a regulation.

f. OGC may require a formal tasking memorandum before performing any work on the issue, and it should be noted that the expected response time for routine items can be lengthy.

g. The program office staff will coordinate the final resolution of these interactions commensurate with the OGC recommendation.

h. Staff should consider notifying the Commission prior to authorizing any ROI with resolution resulting in a substantial departure from the processes specified in NUREG-1021.

6. Processing an ROI with an approved final resolution into ADAMS:

a. The program office staff will document the final resolution in a memo and add the electronic document and supporting documentation to the DRO Document

Tracker in accordance with NRC Form 665 and using the guidance provided on NRC Form 665, Instruction and Cheat Sheet, ML15313A310, and the DRO e-concurrence routing sheet.

b. The following guidance is provided to assist in completing NRC Form 665 pertaining specifically to ROIs:

- ROIs are submitted to the ADAMS Main Library under NRR/NRR-DRO/NRR-DRO/IOLB/ROIs.
- The Document Title for the ROI will be in the format: "ROI-YY-##: [Brief Title]".
- Place the following in the "Document Title(s) or Accession No." box beneath the ROI title:
- "Special Instructions: Please upload the file to the **NRR/NRR- DRO/NRR-DRO/IOLB/ROIs/CY 20##** folder within ADAMS."
- All ROIs are designated as "Non-Publicly Available".
- Sensitivity classifications as follows:
    - B.1: Non-Sensitive – no PII information is included
    - A.5: Sensitive – Privacy Act (if PII information is included)

c. Document SECURITY ACCESS LEVEL should be completed as follows:

- "NRC Users" should NOT be checked
- Check "Limited Document Security" box
- List the following individuals as "Owner":
    - NRR Admin
    - Document Processing Center
    - OL program office branch chief (by name)
    - IOLB Generator of Response (by name)
- List the following as "Viewer":
    - "NRR-Operator Licensing Group"

d. Upon completion of the e-concurrence process, the program office AA will distribute the final ROI to all operator licensing branch chiefs, each regional OLA and the NRR program office OLA, as noted on the ROI Memo Distribution list.

- All completed ROIs are filed by calendar year and by ROI number in ADAMS.

e. The NRR program office OLA will update the SharePoint ROI tracker with the ML#, change the status to complete, and update the resolution action column of the excel document.

f. ROIs are internal documents and will generally not be publicly available in ADAMS or posted directly on the web site; most ROIs are very specific in nature and do not merit conversion and posting on the web site.

7. Revising an ROI after initial submittal:

   a. For ROIs that require changes after their initial submittal, a revised ROI may be submitted.

   b. When submitting the revised ROI, the submitter should indicate this by putting 'REVISION' in the Title/Subject section of the ROI tracker.

   c. A note will be added to the ROI tracker stating that the original ROI was cancelled upon receipt of the revised ROI (i.e., "ROI 14-08 revised on receipt of ROI xx-xx").

   d. The original ROI will be moved to the ADAMS folder for archived and superseded ROI's if it was previously approved and issued. Process the revised ROI in accordance with the applicable portions of this OLMC.

8. Withdrawing an ROI prior to obtaining final resolution:

   a. If a region submitting an ROI wishes to withdraw an ROI without obtaining a final resolution, the following guidance will be used:

      - The branch chief from the region that submitted the original request may submit a request (email is acceptable) to withdraw an ROI for which a final resolution has not been issued. This request will be considered a "withdrawal."

      - The withdrawal request will be sent to the OL program office branch chief and to the NRR program office OLA.

      - Once a withdrawal request is received, the program office will annotate the ROI Final Action/Resolution to capture that the originating region withdrew the ROI, as well as the effective date of the withdrawal (e.g., "ROI YY-## withdrawn on [Month]/[Day]/[Year]").

- The NRR program office OLA will ensure that the withdrawn ROI is annotated in SharePoint ROI tracker as “WITHDRAWN” (may be performed as part of the quarterly update).

b. If the program office has developed an ROI and decides to withdraw an ROI prior to obtaining a final resolution, the following guidance will be used:

- The withdrawal request will be sent to the OL program office branch chief and to the NRR program office OLA.

- Once the withdrawal request is received, the program office OLA will annotate the ROI Final Action/Resolution to capture that the originator withdrew the ROI, as well as the effective date of the withdrawal (e.g., “ROI YY-## withdrawn on [Month]/[Day]/[Year]”). This may be performed as part of the quarterly update.

9. Eliminating/Partially Eliminating a previously resolved ROI:

a. If a region submitting an ROI wishes to eliminate the ROI, the following guidance will be used:

- The branch chief from the region that submitted the original request may submit a request (email is acceptable) to eliminate an ROI for which a final resolution has been issued, but the guidance is no longer applicable.

- A partial elimination is also acceptable. This request will be considered an “elimination,” or a “partial elimination.”

- The elimination/partial elimination request will be sent to the OL program office branch chief and to the NRR program office OLA.

- Once an elimination or partial elimination request is received, the program office will confirm the information is no longer applicable (e.g., it has been superseded or it has been incorporated into NUREG-1021).

- The eliminated ROI will be moved to the ADAMS folder for archived and superseded ROI’s. For partial eliminations, a revised ROI should be issued in accordance with C.7 above such that the revised ROI does not include the information that is not applicable.

- The NRR program office OLA will ensure that the eliminated/partially eliminated ROI is annotated in the SharePoint ROI Index as “ELIMINATED,” or “PARTIALLY ELMINATED(REVISED)” (may be performed as part of the quarterly update) with the reason for elimination/partial elimination.

- If the program office issues ROI guidance that supersedes a previous ROI, guidance provided in an ROI is obsolete, or ROI guidance has been captured in a permanent revision to NUREG 1021 (i.e., after the revision is published AND in effect), the program office may take action to eliminate or partially eliminate an ROI. The program office will follow the same steps as listed above.

ATTACHMENT:

1. Report On Interaction Form

ATTACHMENT 1: Report On Interaction Form

MM DD YYYY

MEMORANDUM TO: [Division Director]
Division of Reactor Oversight (DRO)
Office of Nuclear Reactor Regulation (NRR)

FROM: [Program Office Branch Chief], Chief
Operator Licensing and Human Factors Branch
Division of Reactor Oversight
Office of Nuclear Reactor Regulation

SUBJECT: OLMC-160 REPORT ON INTERACTION JULY 2024

The purpose of this memorandum is to document the completion of Enclosure 1, ROI ##-## in accordance with OLMC-160, “Report on Interaction Process.” Because this issue [does/does not] involve [policy guidance/programmatic direction], division director approval [is/is not] required.

[An OGC review was not required. The basis for this decision was ____.]

Enclosure:
As stated

CONTACT: [Program Office Branch Chief], NRR/DRO
301-415-[XXXX]

SUBJECT: COMPLETION OF ROI ##-## DATED Month ##, 20##

DISTRIBUTION:
Non-Public
[IOLB Author’s name], NRR
[IOLB BC’s name], NRR
[IOLB OLA name], NRR
[Region I BC’s name], RI
[Region I OLA’s name], RI
[Region II BC’s name], RII
[Region II BC’s name], RII
[Region II OLA’s name], RII
[Region III BC’s name], RIII
[Region III OLA’s name], RIII
[Region IV BC’s name], RIV
[Region IV OLA’s name], RIV

ADAMS Accession Number: MLXXXXXXX

OFFICE	NRR/DRO/IOLB	NRR/DRO/IOLB	OGC	NRR/DRO
NAME				
DATE				

OFFICIAL RECORD COPY

OPERATOR LICENSING REPORT ON INTERACTION (ROI) FORM	
Subject: Subject	**ROI No.:** Number
From: From	**Date:** Date submitted
Type of Action: Type of Action	**Proposed Due Date:** Due Date
Background / Issue: Background	

Recommended Action/Resolution: Proposed Solution
Final Action/Resolution: