

INTERIM STAFF GUIDANCE Reciprocity

PURPOSE

The U.S. Nuclear Regulatory Commission (NRC, or Commission) staff is providing this interim staff guidance (ISG) to supplement NUREG-1556, Volume 19, Revision 1, "Guidance for Agreement State Licensees About NRC Form 241 "Report of Proposed Activities in Non-Agreement States, Areas of Exclusive Federal Jurisdiction, or Offshore Waters" and Guidance for NRC Licensees Proposing to Work in Agreement State Jurisdiction (Reciprocity)," due to the revisions to 10 CFR 150.20.

BACKGROUND

On May 23, 2025, President Trump signed Executive Order (EO) 14300, "Ordering the Reform of the Nuclear Regulatory Commission." EO 14300 requires the NRC to undertake a review and wholesale revision of its regulations and guidance documents. In accordance with EO 14300 the NRC amended 10 CFR 150.20 and identified changes to implementation guidance in NUREG-1556, Volume 19, that will yield efficiencies and reduce regulatory burden for Agreement State licensees filing for reciprocity in areas of exclusive federal jurisdiction as well as the NRC staff that process these submittals.

APPLICABILITY

This ISG uses a Frequently Asked Questions (FAQ) format to assist reciprocity applicants in filing initial and amended NRC Form 241 under the revised 10 CFR 150.20 and to NRC staff involved NRC Form 241 reviews or reciprocity inspections.

FREQUENTLY ASKED QUESTIONS

1. What changes were made to 10 CFR 150.20?

The following three changes have been made to 10 CFR 150.20:

- i. 10 CFR 150.20(b)(1) was revised to remove the requirement that an initial NRC Form 241 needs to be filed at least three days prior to engaging in work activities and replaced with language allowing for initial filing to be no later than day of engaging in work activities.
- ii. 10 CFR 150.20(b)(2) was revised to remove the requirement that an amended NRC Form 214 needs to be submitted for changes in location for work in offshore waters.
- iii. 10 CFR 150.20 was revised to allow standard general licenses to be recognized by the NRC for the purposes of reciprocity

2. Who do I contact if I have questions about filing for reciprocity?

You can contact the NRC regional office for the Agreement State that issued your license.

- Region 1: R1Reciprocity.Resource@nrc.gov
- Region 3: R3.reciprocity@nrc.gov
- Region 4: R4Reciprocity@nrc.gov

Please see NUREG-1556, Volume 19, <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v19/index>, for additional information.

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3. How do I find out jurisdiction of job site location?

Please see Appendix B of NUREG-1556, Volume 19, for information on obtaining jurisdiction determinations for job sites.

Initial Reciprocity Filing

4. When do I need to submit an initial NRC Form 241?

In each calendar year, an Agreement State licensee may submit the NRC Form 241 up to the day of engaging in licensed activities for the first time. In addition to the completed and signed form, the Agreement State licensee needs to include a copy of the Agreement State specific license or validated Agreement State standard general license authorizing the activity and the fee required by 10 CFR 170. See NUREG 1556, Volume 19, for more information.

5. Where can I find the NRC Form 241?

The NRC Form 241 can be found here: <https://www.nrc.gov/reading-rm/doc-collections/nuregs/brochures/br0254/index>.

6. How do I submit the NRC Form 241, Agreement State license, and proof of payment?

The report of proposed activities should be submitted by email to the appropriate NRC Regional Office resource box listed on the NRC Form 241 instructions.

7. How do I submit the reciprocity fee required by 10 CFR 170?

The NRC currently accepts electronic payment methods through www.pay.gov. Please visit <https://www.nrc.gov/reading-rm/doc-collections/nuregs/brochures/br0254/index> for information on how to submit a payment.

8. Does NRC require that the NRC Form 241 is signed by the NRC before I conduct work??

No.

9. What is the process if your client (e.g., military installation) requests a signed NRC Form 241 before allowing access to the location?

If your client requires NRC acknowledgement prior to performing activities, you should submit the NRC Form 241 in advance of work activities to ensure the submittal can be reviewed in time. In general, 3-5 calendar days of advance notice is sufficient. The submittal should clearly indicate that receipt of NRC acknowledgement is needed by the client.

Reciprocity in Offshore Waters

10. If I am performing offshore work activities, do I have to submit an amended NRC Form 241 for changes in work location?

No, changes in offshore work location, such as locating to a different platform, do not require an amended NRC Form 241.

11. For offshore work, what location information needs to be provided in the initial or any amended NRC Form 241s?

In the location list the general area, including body of water, where offshore work will be occurring. GPS coordinates for each specific work location in offshore waters are no longer required.

12. How many days can I perform offshore work under reciprocity?

For any calendar year, there is no limit on the number of days worked in offshore waters under reciprocity.

FINAL RESOLUTION

The staff will transition the information and guidance in this ISG into NUREG-1556, Volume 19, as appropriate. Following that transition this ISG will be closed.

PAPERWORK REDUCTION ACT

This ISG provides voluntary guidance for implementing the mandatory information collections on NRC Form 241 that are subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et. seq.). These information collections were approved by the Office of Management and Budget (OMB), under control number 3150-0013. Send comments regarding this information collection to the FOIA, Library, and Information Collections Branch, Office of the Chief Information Officer, Mail Stop: T6-A10M, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001 or by e-mail to Infocollects.Resource@nrc.gov, and to the OMB reviewer at: OMB Office of Information and Regulatory Affairs (3150-0013), Attn: Desk Officer for the Nuclear Regulatory Commission, 725 17th Street, NW, Washington, DC, 20503.

PUBLIC PROTECTION NOTIFICATION

The NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the document requesting or requiring the collection displays a currently valid OMB control number.