NRC/State Working Group on Event Reporting
September 6 - 7, 2000

Attendees:

Robert Dansereau	NYS/DOH (OAS Co-Chair)
Kevin Hsueh	NRC/STP
Harriet Karagiannis	NRC/RES
Linda McLean	NRC/RIV (by telephone)
Kevin Ramsey	NRC/NMSS (NRC Co-Chair)
Steve Sandin	NRC/IRO
Agi Seaton	CSC (facilitator)
Mark Sitek	NRC/NMSS
Helen Watkins	TX/BRC

Revised Charter (Kevin Ramsey)

Changes made per executive guidance. Some changes include:

- New Steering Committee Interface- coordinate efforts with Steering Committee for the National Materials Program Working Group
- New audience for reports - draft and final report to include report on information, report on assessment of information collected
- New Tasks/Changes to Tasks
  - Task 1

    include waste safety information
    review reporting requirements and determine health/safety significance feedback to Strategic Plan, as appropriate (risk considerations) Propose that Linda McLean & Harriet Karagiannis take lead on Task 1
  - Task 2

    NUREG-1556 documents only some list requirements and then don't list all reporting requirements, need to review 1556 documents for completeness?, look at compatibility with State guidance, could suggest development of lengthier reporting requirements document, inspectors need tools to maintain licensee awareness of requirements
  - Task 3

    Kevin Hsueh has lead
  - Task 4

    Task to improve stakeholder understanding (old task 3 included in task 4) Group expected to offer recommendations re: 1)what analysis should be conducted, who should conduct analyses, when, how shared nationally, and 2)identify communication effectiveness and efficiency improvements - may need to propose communication plan (give feedback to data providers and public)
  - Task 5

Essentially unchanged

- New Products
- New Schedule - revised to include
  - steering committee briefing on our working group late Sept. 2000
  - Steering committee interface early Oct. 2000
  - Prepare rough draft to provide to Steering Committee Nov. 2000
  - Brief Committee on draft report early Dec. 2000
  - Conference call re draft report mid Dec. 2000
  - Prepare draft final and provide to Steering Committee late Jan. 2001
  - Brief Steering Committee on Final Report Feb. 2001
  - Issue Report March 2001
- submitted to Management for signature on Sept. 5, 2000

New Task 1 - Review of All Reporting Requirements:(1 hr) Kevin Ramsey

Information needed for NRC Strategic Plan
Current NRC reporting requirements
Discrepancies

- Review Event Assessment Links to the NRC Strategic Plan (NUREG 1614) Table
  - Strategic Goal
    - M2. significant event is defined in different ways, therefore difficult to use as criteria, don't line up with reporting requirements, can we recommend improvement, could use dose rates - abnormal occurrence being used to report to congress already, don't want to invent new criteria
    - M3. Adverse impact on environment not defined
    - M4. Clearly defined
    - M5. Clearly defined

Need to flag disconnects and propose solutions - for some measures difficult to derive "countable item"

  - Performance Goal 1
    - M1. Losses of control hard to define - how to resolve unrestricted areas vs. public domain for counting purposes. Counting actual losses and attempted thefts - another discrepancy, not clearly defined and connected
    - M2. Criticality definition straightforward
    - M3. Footnotes help, new Part 70 may help, some of this not within purview of states
    - M4. New Part 35 not yet final should help
    - M5. Counts are nationwide - need to communicate to states that NRC obligation to Congress is to report back on status of program nationwide
    - M6.
    - M7. Is this inspection finding or reportable event?
  - Performance Goal 2 - increase communication with public/stakeholders
  - Performance Goal 3 - N/A

- Performance Goal 4 - N/A

Would need to do the same review for waste safety component.
Harriet to work on first table, add in more detail and work on table until next month.

■ Current NRC Reporting Requirements - see Regulation Table.wpd - look at NUREG 1460 - includes all reporting requirements. Table includes more important (not all) requirements -Linda to work on this table: Agreement State Compatibility and fill in reporting requirements, etc. can start work 2nd week of October

★ Working Group Representative at OAS Meeting (October 2-4) - Linda will be at OAS Meeting - they would like few minute report to describe working group progress and status

Questionnaire Results: Bob Dansereau/Kevin Ramsey

Agreement State Responses and Regional Responses

Question	Task 1 - Strategic Plan	Task 2 - Guidance	Task 3 - NMED	Task 4 - Generic Issues	Task 5 - Computer SW
I.A		✷			
I.B		✷			
I.C		✷		related	
I.D		✷			
I.E.1			✷		NMED fields
I.E.2			✷		
I.E.3			✷		
I.E.4			✷		
I.E.5			✷		
I.E.6			✷		
II.A			Training		✷
II.B					✷
II.C					✷
II.D					✷

II.E					✷
II.F					✷
III.A				✷	
III.B				✷	
III.C				✷	
III.D				✷	
III.E				✷	
III.F				✷	
III.G				✷	delay post to web
III.H				✷	
IV.A				✷	
IV.B				✷	
IV.C	✷		✷	✷	
IV.D					✷
IV.E					✷
IV.F					✷

Working Group Comments/Recommendations based on Questionnaire

I.A. Look at NUREG 1556 Guidance for list of reporting requirements

I.B. More Guidance given during inspection than licensing

I.C. Mixed results in terms of awareness. Recommendations include IN or other communication to licensees, cover this in Communications Plan

I.D. NUREG-1556 lists of typical notifications useful, but inconsistent. Not placed in same location in each volume. Lists are missing some reporting requirements. Should include all applicable requirements. With regard to reporting medical misadministrations involving patient intervention, need to research requirements in new Part 35. Bob will followup with State that commented on 30.50(b)(2). We don't understand the problem.

I.E.1 One commenter appears to be misinterpreting deadline for NMED reports (30 days from receipt of licensee report). One commenter believes that 24-hour notification of significant events is impractical. (Need to balance State concern of NRC interference with NRC need to respond to inquiries.) Two commenters want justification for making event reporting a matter of compatibility. Need guidance on "Other Events" in the AO

criteria. NMED user's guide needs more detailed information on what is to be entered in each field. One commenter believes Item IV for Medical Licensees on page 28 is confusing and needs to be clarified.

I.E.2 Sometimes licensees don't provide timely reports (fact of life).
Need to respond to event before reporting to NRC (providing "heads up" to NRC is OK, but NRC always asks for additional information -- 10 comments)
(Note that NRC Emergency Officer procedures assign significance to certain types of events. May be able to apply this to SA-300.)

Timeframes:	Significant	Routine
	48 hours	90-120 days
	48	90
	24 after confirm	
		60
		60-90
	72	
	72	30
	>24	
	48	
	48	>30

I.E.3 Local computer problems. Limited resources. Law prevents disclosing name of facility. Law prevents release of information if there is an ongoing investigation (any type). Information may be restricted if ongoing criminal investigation (same for NRC). (Need to address tracking of restricted information and release of reports after investigation is over.)

I.E.4 SA-300 needs to address e-mail to NRC Operations Center (confirmation).

I.E.5 E-mail to NMED contractor needs confirmation also.

I.E.6 SA-300 should make it clear that providing event reports (in other formats, e.g., licensee or inspection reports) to NMED contractor for coding is an option. States are encouraged to review NMED records for accuracy, especially when these alternative input formats are used. Investigate data entry through Internet version of NMED. Investigate ability to export NMED records for e-mail distribution.

II.A. Question may not have been specific enough, and does not capture possible need for training of additional staff. (Trained people may have already been reassigned.) Need for training stated. Is there a schedule for ongoing routine training or just as requested? Could it be on-line training?

II.B. Most states use local version, regions use Internet version.

II.C. Feel that NMED is useful, but difficult to use. Field choices poor, additional data fields requested: e.g., state use code for radioactive material, version needs to be updated. Only initial reports, etc., are available to the public (often contain incorrect and missing data) remain on file - are not deleted; NMED has better information.

II.D. Paper and computer tracking - most respondents have paper tracking.

II.E 3:1in regions in favor of centralized tracking 12:8 from states against centralized tracking

II.F (Regions only) 3:1 there should be one uniform tracking system that each region can operate independently

III.A (AS) 18 Yes/2 No; process may be informal; since states use local version they only see events in their state, Internet version would provide nationwide view and would be more helpful. Currently inquiring about problems by calling other states doing similar types of work.

III.B States agreed that flowcharts were for the most part accurate - with minor modifications. Regions stated chart did not accurately reflect regional followup - some changes need to be made.

III.C Mostly aware that NRC is screening events.

III.D Timeframe for additional information - about 50-50 split for asking for more information within 30 days or period greater than 30 days (90 days, or indefinite wait for written report, would like questions all at once).

III.E All regions yes, 2/3 states yes; Number of requests varied - generally <10.

III.F 2/3 believe requests are reasonable, 1/3 not. Some requests were not for safety significant issues. Requests were also made for info not yet available. Region stated that reason for request is not always clear.

III.G 50-50 States commented that NRC needs better internal coordination required, and information is made public too early.

III.H Regions yes, 50% states yes; all users have found it useful, maybe up to 11 are using NMED for generic assessment.

IV.A Information Notices 18 found it useful/very useful. Newsletters generally useful - may not be timely. NMED quarterly report - regions did not find it useful, 12 states found it useful. Timeliness is also an issue.

IV.B Sometimes passed to licensees - as applicable.

IV.C GPRA - regions are aware, 50% states are aware. One state thought it was only applicable to federal government, states may not see themselves as part of the national program.

IV.D Should share data at some level - regions want access to significant events, states - 50% said to limit to significant events reportable in 24 hours - others want access to all events

IV.E (AS) Posting to web site - most stated 48 hour or more wait

IV.F (AS) information released mostly after investigation is complete or upon request. Only release immediately if a public safety issue.

Progress on Tasks

3. NMED Data Quality — Kevin Hsueh

Discussion of General Concerns vs. task progress

1. What should NRC do if Agreement States do not report significant or routine events to NRC within the period of time specified in the SA-300 procedure?

   Right now we pass on that information to the IMPEP coordinator to follow.

2. It is believed that Agreement State event data should not be used to evaluate State performance.

   At the NRC monthly Events Briefing, NRC participants sometimes ask Agreement State representatives performance type questions. For example,

   Did you review the dose estimate data that you received from the licensee? Is that information sufficient for you to determine whether this is an AO? Did you make a determination, and what is that determination? If you have reached a conclusion, on what basis was it made?

   Can we recommend that there need to have some kind of procedures for that briefing? So that participants know what can be asked and what can not be asked in that briefing.

   Would it be helpful to have an OAS representative in the Events Briefing every time when there are Agreement State events being discussed?

   What should NRC do if NRC identifies some performance issues during the assessment of Agreement State event data?

3. Could NRC provide guidance to Agreement States and ask that they ensure they review their licensee event reports for generic significant issues, as NRC staff currently does.

   Any significant issues from individual state reviews could then be submitted for broader review/discussion at the monthly events briefing. The events briefings would include Agreement State (or OAS) representation so that the Agreement States would participate and agree to any follow-up actions and need for specific regulatory action, such as issuance of an information notice.

   To help ensure consistency, review of a State's "generic issues review process" could be covered during routine IMPEP reviews.

4. Is it OK for Generic Assessment Panel (GAP) to pick up events from RADRAP and analyze them? Can we recommend that there need to have some kind of procedures for the GAP?

5. Bone marrow doses are not required to be included in licensee event reports. However, sometimes we need that to determine whether it is an AO. Can we recommend that the bone marrow dose information be included in certain high dose overexposure events in the regulation? So we do not need to ask for additional information.

2. Licensee Guidance — Helen Watkins

How does this fit into report writing. Guidance provided to licensees may be adequate but may need to be more frequent. Have NRCs guidance (NUREGs), should pull out sections on Web site for comprehensive listing of event notifications. Tables good but hard to locate among all the documents and not consistently placed. It would be helpful to have them all pulled and readily available. Difficult for licensees to find lists. Do Agreement States sponsor web sites? Recommend this. How to let licensees know latest and/or applicable regulations?

4. Generic Issues Program/Stakeholder Understandings — Kevin Ramsey/Bob Dansereau

For consideration: Example of Communications Plan - to communicate with stakeholders. Use this format to guide our effort: goal, history, audience, tools, key messages (information needed in timely fashion, necessary to NRC mission, states required to collect and forward data for this to be accomplished), cost and schedule, evaluation criteria, findings. SEND COPY TO LINDA

Consider initiating a waiting period to help eliminate faulty and incomplete data, allow licensee to respond appropriately,....

Consider need for Commission statement reaffirming partnership with Agreement States on roles in event response and assessment

5. Software Systems — Steve Sandin

Attach Background handout
Not all reports received end up in database (those for IAT {sensitive} not included)
Delay reports? - routinely issued each morning, OGC says procedure can change
Add field for Release Date - default could be 48 hours,
For ongoing investigation distribute within agency will be available later, but caveat not to distribute further

Task 6 Software Systems Review handout — Mark Sitek

Report Outline

Modified existing TOC, see 9-7-toc.wpd

Next Steps

- Should the definition of significant events in SA-300 be redefined with respect to risk significant safety based criteria (use emergency officer procedures to fill in safety significance column in Reporting Requirements Table)
- Brief Steering Committee — late September 2000
- Provide Status Report at OAS Meeting — Oct 2-4, 2000
- Working Group Conference Call — Oct. 11, 2000 2-4 PM

Remaining Tasks:

2. Licensee Guidance (30 min) Helen Watkins
3. NMED Data Quality (15 min) Kevin Hsueh
4. Generic Issues Program/Stakeholder Understand.(30min) Kevin Ramsey/Bob Dansereau
5. Software Systems (30 min) Steve Sandin/Mark Sitek

Additional Items:

Working Group Representative at OAS Meeting (October 2-4)
Revise Report Outline