Pre-Licensing Guidance Update

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Overview

• Pre-Licensing Guidance Format
• Changes made to the Pre-Licensing Guidance by the working group
• Changes made to the Pre-Licensing Guidance based on comments
• Implementation of the Pre-Licensing Guidance
• Pre-Licensing Guidance training dates (webinar)
Pre-Licensing Guidance Format

• The revised 2018 Pre-Licensing Guidance supersedes the 2008 version (RCPD 08-020)
• Step 1 – Initial Screening
  - Six questions to help determine whether a new applicant or new owner is a known entity
• Step 2 – Additional Screening and Pre-Licensing Site Visit
  - Must be filled out if the applicant is NOT a known entity
  - Criteria to consider in order to establish a basis for confidence that material will be used as intended
  - Includes a section for “Withdrawn, Suspended, or Denied” applications
• Attachment 4 – Form to document “Withdrawn, Suspended or Denied” applications
Pre-Licensing Guidance Format

- Step 2 – Additional Screening and Pre-Licensing Site Visit
  - Step 2a – Pre-Licensing Site Visit Record
    - Form to document the PLSV
  - Attachment 2 – Guidance used to perform the PLSV

- Step 3 – Notify NRC Headquarters at NMSS/MSST/SMPB
  - Use if NO basis for confidence in Step 2
  - Technical Assistance Request
    - Includes criminal history background check
  - Step 3b – Example of Completed TAR form
Changes Made by the Working Group

• Directed the reviewer to perform additional independent reviews not outlined in the NUREG-1556 series.

• Added explicit language to the guidance section of the Checklist to better reflect the suspension of the good faith presumption.

• Included additional considerations for best practices in documenting basis for confidence, additional screening, and Pre-Licensing Site Visit (PLSV).
Changes Made by the Working Group

Â Added a criteria to the Step 2 and PLSV record to affirm that no suspicious information was identified during the review.

Â Added a background check consent form (for uncertainties remaining without clear indication of suspicious activity) to Step 3.

Â Directed staff to delay scheduling and conducting PLSVs until all substantive safety and security paper license application review issues have been resolved.
Changes Made by the Working Group

- Determine readiness of the licensee when facilities are incomplete and/or radiation safety equipment has not been purchased or installed.

- Incorporated a “Withdrawal, Suspension or Denial” section in Step 2 to capture these types of occurrences during the application process.
Changes Made Based on Comments Received

• Removed question #4 with regards to relocation of an existing license, or its mailing address to another State.

• Added a question for former licensees that have been terminated under favorable conditions (e.g. no principal activity performed in 24 months).

• Added a question for changes of control where the request is limited to a parent company that already owns an NRC or Agreement State radioactive materials license.
Implementation

Å The practice of hand-delivering licenses during the PLSV should be suspended effective immediately.

Å Agreement State implementation of the PLG is within 6 months from the date of the RCPD 18-005 letter dated August 09, 2018 (or February 9, 2019).

Å NRC implementation of the PLG is immediate.
What’s Next??

- Training via webinar
  - Tuesday, August 28, 2018 from 2:00 PM – 3:30 PM (EST)
  - Thursday, September 6, 2018 from 2:00 PM – 3:30 PM (EST)
  - Links for each date are in the RCPD letter

- Security Toolbox
  - Pre-Licensing Guidance
  - Comment resolution
  - Recording of the Webinar
Questions?

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Wrap up!!

- Revised Pre-Licensing Guidance has been issued
- Practice of hand-delivery of licenses at the time of the Pre-Licensing Site Visit should be suspended effective immediately
- Specifics on how to use the Pre-Licensing Guidance will be discussed during the webinar
- Webinar training is around the corner!!!!!!
  - August 28 & September 6. Sign up and attend
Thank you!

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