Update on General Licensing Program Re-evaluation

2019 OAS Annual Meeting
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OAS Co-Chair – General Licensing Re-Evaluation Workgroup
Scope of existing GLWG Evaluation of the General Licensing Program

- Category 3 Working Group identified potential H&S basis for changes to the GL Program
- No need for changes to the GL Program based on security and accountability of Category 3 GL devices
- Feedback received from Agreement States and other stakeholders on cost to implement a regulatory program when most GL devices present low risk to the public
- Historical information and previous direction to consider modest changes to the GL Program
Scope of Working Group Activities

- Program Basis and Historical Review
- Effectiveness of NRC Registration Program and Alternate Programs Implemented by States
- Stakeholder Feedback
Working Group Efforts

- State Survey
- Data Mining
  - GLTS, NMED, and enforcement information in databases and ADAMS
- Data and Trend Analysis
  - Initial transfers, lost/stolen, and recovered devices
- Historical studies
- Interviews of M&DS
- Recommendations
  - Detailed cost analysis
  - Pros and cons
Enhancements Under Consideration

- RECONCILIATION OF GLTS DATA
- NATIONAL DATABASE
- RISK INFORMING GL PROGRAM
- REGULATORY ENHANCEMENTS
- MINIMUM PROGRAM IMPLEMENTATION REQUIREMENTS
- ADDITIONAL OVERSIGHT
- ENHANCED COMMUNICATIONS
Observation 1:

Data Inaccuracy in GLTS

Option 1: No reconciliation of GLTS
Option 2: One-time reconciliation ($$$)
Option 3: Partial (50%) reconciliation ($$$)
Option 4: Device-specific reconciliation ($$)
Observation 2:
Lack of Consistent Accountability of GL Data

Option 1: No national database
Option 2: Convert GLTS into national tracking system ($$$)
Observation 3:

Risk Informing the GL Program

Option 1: Status Quo
Option 2: Re-evaluate low-risk GL devices ($)
Option 3: Risk inform GL reporting requirements ($)
Option 4: Set minimum threshold values for GL devices ($)
Observation 4:

Lack of Consistent Oversight

Option 1: Status Quo

Option 2: NRC/AS Working Group to look into expansion of GL regulatory framework (inspection oversight, IMPEP, etc.) ($)
Observation 5:
No Routine Outreach with GL Users

Option 1: Status Quo
Option 2: Develop annual communications tool ($$$)
Next Steps

Brief NRC management to reach consensus on path forward

Allow work to continue
Consider ways to address working group recommendations not related to the specific reconciliation activities
Informational paper to Commission

Overview of working group’s activities and recommendations

Used to decouple this working group’s efforts from the Category 3 paper

Not final – still under consideration
Close out existing workgroup and create new workgroup

- Follow on workgroup to build off existing working group recommendations with broader perspective and scope.
  - made up of NRC and Agreement States
  - review the GL Program from a broader risk-informed approach and efficiency perspective rather than just health and safety
  - align with one of the NRC/OAS priorities for the National Materials Program for 2019-2020

Not final – still under consideration
Working Group Members

- Tomas Herrera, NMSS/Co-Chair
- Angela Leek, Iowa/OAS Co-Chair
- Adelaide Giantelli, NMSS
- Ed Harvey, Region III
- Todd Jackson, Region I
- Morgan Bullock, Washington
- Kevin Null, Region III
- Joseph Power, New Jersey
- Celimar Valentin-Rodriguez, NMSS
- Duncan White, NMSS

THANK YOU!