Update on General Licensing Program Re-evaluation

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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





RECONCILIATION OF GLTS DATA



NATIONAL DATABASE



RISK INFORMING GL PROGRAM



REGULATORY ENHANCEMENTS



MINIMUM PROGRAM IMPLEMENTATION REQUIREMENTS



ADDITIONAL OVERSIGHT



ENHANCED COMMUNICATIONS

Enhancements Under Consideration



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



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 riskinformed 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







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!