



OAS ad hoc member of Common Prioritization of Rulemaking (CPR)

First Impression: A well-oiled NRC rulemaking machine

Potential rulemaking is ranked based on several factors

A: Strategic Goals - Safety, Security

B: Principles of Good Regulation – Independence, Openness, Efficiency, Clarity, Reliability, Excellence

C: Internal – Governmental (NRC, Congress, etc.) Priority

D: External – Public (industry, non-governmental organization, etc.) Priority

Total Prioritization Score = Factor A + Factor B + Factor C + Factor D

According to SA 801-A, OAS Director of Rulemaking contributes to the scoring



OAS participation in Standing Committee on Compatibility (SCC)

- NRC determines compatibility category using MD 5.9
- SCC offers an independent review and assessment of the NRC's designations for regulations, guidance documents, and other legally binding requirements to ensure consistence with MD 5.9
- Recommendation included in Commission paper
- The OAS Director of Rulemaking is co-chair



SA-10: Joint Oversight of the National Materials Program

The addition of one word “Joint” has taken the Agreement States to a cooperative culture and actual partnership.

Problem: Changing leadership at the NRC causes consistency problems

Solution: NRC-OAS Co-Champions

Problem: Onerous Petition for Rulemaking Process

Solution: OAS Member on the CPR giving OAS more status and should lessen the need for petitions for rulemaking.

Problem: No appeal process for IMPEP

Solution: Working on an appeal process after MRB Decision



Examples of OAS Influence

Rulemaking

- STC-19-023: Draft Approaches For Training And Experience Requirements For Radiopharmaceuticals
- STC-18-009: Very Low-level Radioactive Waste Scoping Study And Greater Than Class C Waste
- STC-19-009: Ground Water Protection at Uranium In Situ Recovery (ISR) Facilities

Licensing Guidance

- RCPD-19-006: Y-90 Licensing Guidance
- RCPD-19-008: Draft Xcision® Gammapod™ Licensing Guidance
- RCPD-18-006: Germanium-68/Gallium-68 Pharmaceutical Grade Generators Licensing Guidance

Numerous NRC/OAS Procedures

- SA-10, SA-107, SA-200, SA-201, MD 5.6