

Inspection Manual Chapter 2800 Updates

Aaron T. McCraw, Chief
Materials Inspection Branch
Division of Nuclear Materials Safety
U.S. NRC Region III

Augustinus Ong, Administrator
Radiological Health Section
Dept. of Health and Human Services
State of New Hampshire

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Phase 1

- To evaluate the allowance of more flexibility and logical extensions to the inspection interval of materials licensees that will not diminish the protection of public health and safety or security of licensed material
- Completed September 12, 2017

Notable Changes

- 1) Changed current 25% buffer to 50%
- 2) Extended the initial inspection period if licensees are not in possession of material
- 3) Allowed for extensions based on good performance on a case-by-case basis

Other Changes

- 4) Relaxed escalated enforcement followup inspections out to 12 months
- 5) Removed example of “significantly expanded program”
- 6) Other minor consistency changes

Phase 2

- To continue efforts started in Phase 1
- A more comprehensive evaluation to recommend and implement changes to the materials inspection program that will not diminish the protection of public health and safety or security of licensed material
- ETA: December 2019

Phase 2 Membership

- Brian Goretzki, OAS-AZ
- Aaron McCraw, Region III (co-chair)
- Augustinus “Auggie” Ong, OAS-NH (co-chair)
- Beth Schilke, OAS-VA
- James Thompson, Region IV
- Elizabeth “Betsy” Ullrich, Region I

Project Plan for Phase 2

- Inspection frequency review
- Inspection documentation
- Exempt distribution licenses
- Multiregional licenses
- “Main office”/field office requirements
- Use of in-office review/remote inspections
- Reciprocity

Changes outside of Project Plan

- Reorganized and revised to improve flow
- Reintroduced Priority 4
- Renamed “Telephone Contacts” (aka Priority T) to “Remote Contacts” (Priority R)
 - Established as inspections
- Strengthened focus on performance-based approached
- Broadened use of risk-informed approach throughout inspection process

Inspection frequency review

- Collected event data from NMED
- Collected enforcement data from NRC and select Agreement States
- Surveyed NRC and State staff to get perspective on “inspector intuition”
- Analysis of info and any changes to frequencies in next phase, with the exception of exempt distribution licenses (discussed later)

Inspection documentation

- Consolidated inspection document options from three to two:
 - NRC Form 592 (formerly NRC Form 591M Part 3)
 - Narrative report
- Established two ways to transmit inspection findings:
 - NRC Form 591M (formerly Part 1 and/or 2)
 - Letter (with or without Notice of Violation)
- Working toward automation through WBL

Exempt distribution licenses

- Assumptions
 - Already inspected under possession license
 - Low safety significance of materials and findings
 - Many findings identified before onsite inspection
- Changed to Priority R
- Use possession license inspection to inform need for onsite inspection
 - Will require sharing/communication of inspection findings among regulators (more on this later)

Multiregional licenses

- Clarified responsibilities for documentation and enforcement on assist inspections
- Established communication expectations when inspecting outside of home region to promote efficiency
- More to come in next phase
 - Leveraging WBL as a more efficient/effective inspection planning tool

Main office/field office requirements

- Eliminated definition of “main office”
- Aligned inspections of multiple authorized locations of use to harmonize with new licensing program codes:
 - 1-5 authorized locations – 40%
 - 6-20 authorized locations – 30%
 - More than 20 authorized locations – 20%
- Emphasized risk-informed approach to selection, number, and scope

Use of in-office review/remote inspections

- Recognized advancements in technology
- Clarified throughout document that inspectors can and should use remote means of inspection as appropriate and commensurate with risk
- **EXAMPLE:** electronic records review with Corporate RSO located outside of jurisdiction
 - But wait... there may be another option...

Another noteworthy change

- Established a standalone section on coordination with State agencies
- Added stronger language to leverage the collective efforts of the NMP
 - Essentially “reciprocal recognition of inspections”
 - If parts of the licensee’s program are already inspected by a co-regulator, use their findings to determine if additional effort is necessary on your part

Reciprocity

- Rescinded Inspection Manual Chapter 1220
 - Relocated guidance to appropriate licensing or inspection guidance documents
 - Reciprocity inspection requirements now in IMC 2800
- Eliminated concept of “core” candidates
- Eliminated 20% goal in recognition of the applicants being inspected by “home” jurisdiction
- Established risk-informed selection criteria

Questions?
Comments.
Kudos!

But wait... there's more!

Phase 3

- Review and revise inspection frequencies
- Risk-inform the Inspection Procedures
- Further enhancements to help strengthen the National Materials Program
- Anything else...?