



STP Procedure Approval

Format for STP Procedures **AD-100**

Issue Date: May 31, 2001

Review Date: May 31, 2004

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NOTE

The STP Director's Secretary is responsible for the maintenance of this master copy document as part of the STP Procedure Manual. Any changes to the procedure will be the responsibility of the STP Procedure Contact. Copies of STP procedures will be distributed for information.



Procedure Title:
Format for STP Procedures
Procedure Number: AD-100

Page: 1 of 4

Issue Date:
05/31/01

I. INTRODUCTION

This procedure establishes the format and content requirements for all procedures to be incorporated into the Office of State and Tribal Programs (STP) Procedure Manual.

II. OBJECTIVE

To provide guidance to STP staff regarding the creation and update of standardized STP internal procedures. A procedure categorization, numbering system, format outline and content definition are addressed in this procedure.

III. BACKGROUND

The intent of STP procedures is to provide guidance for the implementation and coordination of all major office-related activities, a number of which are generally addressed in the NRC Management Directives.

IV. ROLES AND RESPONSIBILITIES

- A. The Director, STP, is responsible for review and approval of all STP procedures and revisions, as well as for assigning procedure review dates.
- B. The Deputy Director, STP, is responsible for assigning staff as lead procedure contacts and for review and concurrence in all STP procedures and revisions.
- C. Each STP staff Procedure Contact is responsible for tracking and updating their assigned procedure(s). Additionally, each STP staff Procedure Contact should complete a review of their assigned procedure(s) within three months of the original due date and develop recommended changes to the procedure, as well as a schedule for completion, for STP management review and approval.
- D. The STP Procedure Coordinator is responsible for providing interim procedure review to ensure overall coordination of the procedure update process and for tracking procedure status for inclusion in the STP Operating Plan.

- E. The STP Director's Secretary is responsible for maintaining the master copy of procedural documents issued by STP and for forwarding an electronic copy to STP's contractor for inclusion on STP's Home Page.

V. GUIDANCE

- A. Each STP procedure will fall into one of the following categories, as noted in Appendix A: Administrative (AD), State Agreements (SA), State Liaison (SL) and Background (BK).
 - 1. The content of procedures under AD, SA and SL will contain the following entries (followed by *Not Applicable*, where appropriate): Introduction, Objectives, Background, Roles and Responsibilities, Guidance, and Appendices and References, if applicable. Reviews and approvals will be covered under Roles and Responsibilities or in the Guidance sections.
 - 2. The content of procedures under BK will contain the following entries: Program Description, Statutory Authority, Regulatory Authority and Policy Statements.
- B. The STP Procedure Manual Table of Contents will follow the example in Appendix B, and will include the current STP procedure number, title, date of issuance, and review date.
- C. The first page of each procedure will be preceded by an approval sheet and will follow the example in Appendix C.
- D. The first page header for each procedure will follow the example contained herein to include the NRC seal, STP procedure title and number, page number and issue date. Subsequent pages of each procedure will contain a modified header and include the procedure number and title, page number and issue date.
- E. A Comment Resolution Document will be prepared, following the example in Appendix D, by the designated STP Procedure Contact, to show the disposition of procedure comments. This document will be included as background to the final procedures
- F. To avoid confusion that may result from single-page replacements, revised procedures are to be issued in their entirety.

- G. Lengthy, detailed procedures may benefit from the use of procedure-related handbooks. Handbooks become a permanent part of STP procedures and should be clearly marked and cited as appendices. Handbook format should follow the example in SA-300, Handbook on Nuclear Material Event Reporting in the Agreement States.
- H. Reviews
1. Designated STP Procedure Contacts will review and revise assigned procedures, as needed. The cycle for review will be determined by the review date and will be not less than one year and not more than three years.
 2. The STP Procedure Coordinator will provide interim procedure review and ensure overall coordination of the procedure update process.
 3. New procedures concerning the Agreement States and State Liaison programs, or those procedures requiring significant revisions, will be distributed for review and comment to STP staff, Regional State Agreements Officers, Regional State Liaison Officers and other persons designated by the Director, STP (e.g., Agreement States).
 4. Designated STP Procedure Contacts will prepare a Comment Resolution Document only when comments are received. The Comment Resolution Document will address reviewer comments and serve as background to the final procedures (See Appendix D).
- I. Approvals
1. STP procedures will have STP Procedure Approval sheets as cover pages (see Appendix C). Signatures on the approval sheet will include the Director, STP; Deputy Director, STP; and the STP Procedure Contact.
 2. Final versions of STP procedures will be submitted to the Director, STP, for approval.
 3. The date the Director, STP, signs the STP Procedure Approval sheet will be the issue date for an STP procedure.
 4. Final STP Procedures and Comment Resolution Documents will be placed in ADAMS.

5. The final version of the STP Procedure will be electronically available on the STP Home Page. Final versions of Procedures with significant impacts concerning the Agreement States and State Liaison programs will also be distributed to the appropriate State contacts.

VI. APPENDICES

Appendix A - STP Procedure Manual Code Categories
Appendix B - STP Procedure Manual Table of Contents
Appendix C - STP Procedure Approval
Appendix D - STP Sample Comment Resolution Document

VII. REFERENCES

STP Procedure - [SA-300](#) - *Handbook on Nuclear Material Event Reporting in the Agreement States*

Appendix A
STP Procedure Manual
Code Categories

Code	Description
BK	Background
	100 NRC Agreement State Program Description Documentation
SA	State Agreements
	100 Integrated Material Performance Evaluation Program (IMPEP)
	200 Compatibility Categories and Health and Safety Identification for NRC Regulations and Other Program Elements
	300 Reporting Material Events
	400 Management of Allegations
	500 Jurisdiction Determinations
	600 Training Criteria for Agreement State Personnel
	700 Processing a Request for an Agreement
	800 Providing NRC Predecisional Documents to Agreement States
	900 Termination of Uranium Mill Licenses in Agreement States
	1000 Implementation of the Grant Program for Funding Assistance for Formerly Licensed Sites in Agreement States
SL	State Liaison
	100 State, Local, and Tribal Government and Organizational Liaison Program
	200 Updating List of Governors' Designees for Advance Notification of Nuclear Waste Shipments
AD	Administrative Support
	100 Format for STP Procedures
	200 Document Distribution: Procedures for Transmitting Documents to the Public Document Room (PDR); Distribution of All Agreement State Letters; Filing
	300 Action Item Tracking
	400 STP Staff Training
	500 Invitational Travel/Authorizations and Vouchers
	600 Integrated Materials Performance Evaluation Program (IMPEP) Staff Procedures

Appendix B

Office of State and Tribal Programs (STP) Procedure Manual

Table of Contents

Procedure Number	Subject	Issue Date	Review Date
<i>STP Program Background (BK) Series</i>			
BK-100	NRC Agreement State Program Description Documentation	03/22/00	03/22/01
<i>STP State Agreements (SA) Series</i>			
SA-100	Integrated Material Performance Evaluation Program (IMPEP)	07/11/00	07/11/02
SA-101	Reviewing Common Performance Indicator #1, Status of Materials Inspection Program	01/06/00	07/06/01
SA-102	Reviewing Common Performance Indicator #2, Technical Quality of Inspections	01/06/00	07/06/01
SA-103	Reviewing Common Performance Indicator #3, Technical Staff and Training	01/06/00	07/06/01
SA-104	Reviewing Common Performance Indicator #4, Technical Quality of Licensing Actions	01/06/00	07/06/01
SA-105	Reviewing Common Performance Indicator #5, Response to Incidents and Allegations	01/06/00	07/06/01
SA-106	Management Review Board	05/18/00	05/18/02
SA-107	Reviewing Non-Common Performance Indicator #1, Legislation and Program Elements Required for Compatibility	01/07/00	07/07/01
SA-108	Non-Common Performance Indicator - Sealed Source & Device (SS&D) Reviews		
SA-109	Non-Common Performance Indicator - Low-Level Waste (LLW) Reviews		
SA-110	Non-Common Performance Indicator - Uranium Recovery Program Reviews		
SA-111	Implementation of Management Directive 5.10, Formal Qualifications for IMPEP Team Members	12/01/00	12/01/02
SA-112	Emergency Suspension of Section 274b Agreement	03/21/99	03/21/00
SA-113	Placing an Agreement State on Probation	11/24/00	11/24/02
SA-114	Suspension of a Section 274b Agreement	02/08/01	02/08/03
SA-115	Termination of a Section 274b Agreement	03/21/99	03/21/00
SA-116	Periodic Meetings with Agreement States Between Integrated Material Performance Evaluation Program (IMPEP) Reviews	01/21/00	07/21/01
SA-117	Agreement State Project Officers (ASPO)	05/31/01	05/31/04
SA-118	Orientation Meeting for New Agreement States	07/14/99	07/14/00

Procedure Number	Subject	Issue Date	Review Date
SA-119	Follow-up Integrated Materials Performance Evaluation Program (IMPEP) Reviews		
SA-200	Compatibility Categories and Health and Safety Identification for NRC Regulations and Other Program Elements	02/06/01	02/06/02
SA-201	Review of State Regulations	11/10/98	11/10/99
SA-300	Reporting Material Events	05/23/01	05/23/03
SA-400	Management of Allegations	01/22/01	01/22/04
SA-500	Jurisdiction Determinations		
SA-600	Training Criteria for Agreement State Personnel	01/22/01	01/22/03
SA-700	Processing an Agreement	04/02/01	04/02/03
SA-800	Providing NRC Predecisional Documents to Agreement States	03/26/99	03/26/00
SA-900	Termination of Uranium Mill Licenses in Agreement States	04/20/99	04/20/00
SA-1000	Implementation of the Grant Program for Funding Assistance for Formerly Licensed Sites in Agreement States	01/25/01	01/25/02
<i>STP State Liaison (SL) Series</i>			
SL-100	State, Local, and Tribal Government and Organizational Liaison Program		
SL-200	Updating List of Governors' Designees for Advance Notification of Nuclear Waste Shipments	02/17/99	02/17/02
<i>STP Administrative Support (AD) Series</i>			
AD-100	Format for STP Procedures	05/31/01	05/31/04
AD-200	Document Distribution: Procedures for Transmitting Documents to the Public Document Room (PDR); Distribution of All Agreement State Letters; Filing		
AD-300	Action Item Tracking		
AD-400	STP Staff Training	10/22/99	10/22/02
AD-500	Invitational Travel/Authorization and Vouchers	06/06/00	06/06/02
AD-600	Integrated Materials Performance Evaluation Program (IMPEP) Staff Procedure		

Appendix C



STP Procedure Approval

(STP Procedure Title)
(STP Procedure Number)

Issue Date:

Review Date:

Director, STP

Date:

Deputy Director, STP

Date:

Procedure Contact, STP

Date:

NOTE

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Appendix D

Comment Resolution Document

Summary of Comments Received on SA-XXX, "TITLE OF STP PROCEDURE"

I. Sent to the Agreement States for Comment: January XX, 2001 (STP-01-XXX)

Comments Dated: Illinois, Date (letter)
Washington, Date (email)
Georgia, Date (markup)

Response to/Resolution of Comments:

Illinois

Comment 1: On page 1, item III, Background: "The authority for review of Agreement States ..." State should be plural.

Response: This correction will be made.

Comment 2: On page 2, item IV.B.1, Director, STP: The Director of STP also "assigns IMPEP Team Leader for Agreement State reviews."

Response: We agree with the intent of the comment and revise the procedure to include in the guidance that the Director, STP, approves the assignment of IMPEP team leaders for Agreement State reviews.

Comment 3: On page 3, item IV.F.1, Director, Division of Industrial and Medical Nuclear Safety: Director, Division of IMNS also "assigns IMPEP Team Leader for review of NRC Regions."

Response: We agree with the intent of the comment and will revise the procedure to include in the guidance that the Director, IMNS, approves the assignment of IMPEP team leaders for NRC Regional reviews.

Comment 4: On page 4, item IV.I.1, IMPEP Team Member: Should be "Completes the review of assigned indicator(s) and writes corresponding section(s) of the IMPEP report;" to avoid singular/plural problem with subject (IMPEP Team Member) and double use of plural "their."

Response: This correction will be made.

Comment 5: On page 5, item V.A.2 and 3, Follow-up Reviews and Periodic Meetings with Agreement States Between IMPEP Reviews: References two STP Procedures that do not appear in the list of references on Page 23. Also, I did not find these procedures (SA-116 and SA-119) in my collection, nor did I find them (easily) at the STP web site. Have these been distributed to the Agreement States for review and comment? I must have missed them.

Response: SA -116, "Periodic Meetings with Agreement States Between IMPEP Reviews" is a reference that will be added to the list of references in the procedure. This document has been previously distributed to the Agreement States for review and comment and has been finalized. It is available on the STP web page under procedures. SA-119, "Follow-up Integrated Materials Performance Evaluation (IMPEP) Reviews" is a new procedure under development and is scheduled to be sent to the Agreement States for review in late FY 200X and finalized in FY 200X. We are also including this reference to the guidance, although the document is not yet available.

Comment 6: On page 5, item V.A.4, Special Meetings: Discusses "special meetings," providing some criteria for determining when to hold one, but does not indicate who makes the decision to do so.

Response: Item V.A.4.b. has been revised as follows:

A special meeting for a State or NRC Region may be scheduled **upon request by NRC or** when requested by the State or Region based on ~~the justification~~ **NRC's evaluation of the need** for such a meeting.

Washington

Comment: I have read the draft STP Procedure SA-100, Implementation of the Integrated Materials Performance Evaluation Program and have no comments.

Response: No response is necessary.

Georgia

Comment 1: This document does not appear to include provisions for audits of NRC Headquarters such as the sealed source and device reviews. As the Department understands it, these are to be routine audits conducted under IMPEP. Please include these in the SA-100 procedure.

Response: At the present time, Management Directive (MD) 5.6 does not include reviews of NRC Headquarter functions. Although an IMPEP type review of the SS&D headquarters function was performed in 1999 using the guidance and procedures developed for the Agreement States and Regional reviews, current practice is to

implement MD 5.6 as written. When the results of the SS&D working group and re-engineering of the SS&D program are available, staff will revisit this issue. There will be no change to the procedure based on this comment.

Comment 2: In Section V(C)(2), page 7, if this is a process involving a partnership in the audit of regulatory programs, the option of including additional Agreement State personnel on review teams should be provided, particularly for sealed source and device reviews of NRC.

Response: We will revise this section to allow flexibility in the number of IMPEP team members including additional Agreement State personnel based on the individual State or Region.

II. Sent to the NRC Offices for Comment: January XX, 2001

Comments Dated: Region I, Date (email)
NMSS, Date (email)

Region I

Comment 1: On page 2, item IV.D, Senior Project Manager for IMPEP Coordination, STP: Duties should also include staffing of IMPEP reviews and provide refresher and initial training for IMPEP members.

Response: We agree with this comment and will revise the guidance accordingly.

Comment 2: On page 6, item V.C.2, Routine IMPEP Reviews: Staffing for Agreement State reviews are normally three (for smaller States) or four (for larger States). Additionally, throughout the document, references to Regional NMSS, should be changed to "Region or NRC Region."

Response: We agree with this comment and will revise the procedure to indicate there is flexibility in the number of team members, depending on the size of the program. The procedure will be revised to change Regional NMSS to Region.

NMSS

Comment: In Section IV(I), page 4, include additional duties of IMPEP team members such as interviews with appropriate staff and inspection accompaniments.

Response: The procedure notes that the IMPEP team member "Conducts the review of all indicators in accordance with the applicable OSP procedures" and does not repeat the detailed information, which includes guidance on interviews and inspector accompaniments found in SA-101 through SA-105. There will be no change to the procedure based on this comment.