



Accredited Standards Committee (ASC) N15 “Methods of Nuclear Material Control”

***A Technical Committee of the
Institute of Nuclear Materials Management (INMM)***

Organizational Structure and Operating Procedures for the Development and Coordination of American National Standards

PROCEDURE APPROVALS AND ACCREDITATION

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1.0 ORGANIZATIONAL STRUCTURE AND MISSION OF INMM ASC N15

1.1 Charter and Mission of N15

Accredited Standards Committee N15, Methods of Nuclear Material Control, endeavors to develop and maintain necessary and current voluntary consensus standards for the protection, control and accounting of special nuclear materials in all phases of the nuclear fuel cycle, including analytical procedures where necessary and special to this propose; except that physical detection of special nuclear materials within a nuclear power plant is not included.

1.2. N15 Organization, Roles and Responsibilities

The membership includes voting and non-voting members with interest in the activities of ASC N15.

The ASC N15 membership is comprised of the Board of Officers, all general members (as reflected on the membership list), and those individuals on the Consensus Body Ballot Roster. The Consensus Body Ballot Roster is a voting subset of the membership chosen to represent all N15 stakeholder interests. A working definition for each of the stakeholder interest groups is provided in the Procedures below, Section 2.3, as well as in Annex A, Definitions.

The Institute of Nuclear Materials Management (INMM) serves as the Secretariat for ASC N15. The N15 Chair coordinates the activities of ASC N15.

a) Responsibilities of N15 General Membership

- Proposing American National Standards within the scope of N15;
- Maintaining the standards developed by N15 in accordance with *ANSI Essential Requirements*;
- Adopting N15 policy and procedures for interpretations of the standard(s) developed by the consensus body (see Section 3.3 herein);
- Responding to requests for interpretations of N15 standard(s) (see Section 3.3 herein); and
- Adopting N15 procedures and revisions thereof.

b) Responsibilities of the N15 Consensus Body Ballot Roster

- Approving all applicable N15 standards actions;
- Approving changes to the N15 Board of Officers;
- Approving changes to committee scope; and
- Voting on approval of the addition or termination of consensus body ballot roster members (see Section 1.2.f. herein).

c) Responsibilities of N15 Secretariat (INMM)

- Applying for N15 accreditation by ANSI and maintaining accreditation in accordance with ANSI requirements as specified in the *ANSI Essential Requirements*, including submission of the consensus body ballot roster;
- Submitting candidate standards approved by the consensus body ballot roster, with supporting documentation, for ANSI review and approval as American National Standards;

- Maintaining a list of the general membership (including subcommittees and writing groups) and the consensus body ballot roster;
- Overseeing the consensus body's compliance with these procedures;
- Retaining records of all standards actions, ballot results, subcommittee meeting minutes and annual reports;
- Administrative work, including preparation of annual meeting notices and the handling of meeting arrangements; preparation of ballots and draft standards; and maintenance of adequate records, as agreed with the Board of Officers;
- Maintaining a list of the standards for which N15 is responsible; and
- Approving a written agreement to ANSI defining explicit division of these responsibilities if composed of more than one standards developing organization (i.e., co-secretariats).

d) Responsibilities of N15 Board of Officers

The N15 Board of Officers is comprised of the following:

- Chair
- Vice Chair
- Secretary

There shall be a chair and vice-chair appointed by the INMM (N15 Secretariat), subject to approval by majority vote of the N15 Consensus Body Ballot Roster. Applicants may include (but are not limited to) the individual members or representatives of the consensus body. Each will serve until a successor is selected and ready to serve. The vice-chair shall carry out the chair's duties if the chair is temporarily unable to do so. The secretary shall be appointed by chair, with confirmation by the N15 Secretariat.

The Board of Officers of ASC N15 shall appoint subcommittee chairs and may assist a subcommittee chair in recruiting and selecting the members of a newly constituted subcommittee. The Board of Officers of ASC N15 shall appoint and/or confirm writing group chairs and assist in recruiting and selecting members of a newly constituted writing group. The N15 Chair will also determine placement of Writing Groups under the purview of Subcommittees, as applicable.

The N15 Board of Officers is responsible for:

- Administrative work, including preparation of N15 annual meeting notices and the handling of meeting arrangements; preparation and distribution of meeting agendas, minutes, ballots and draft standards; and maintenance of adequate records, as agreed with the Secretariat;
- Supporting writing groups who express interest in the potential development or revision of an ANS under the scope of ASC N15;
- Appointing the chairs of N15 subcommittees; and,
- Appointing and/or confirming chairs of N15 writing groups.

e) Responsibilities of N15 Subcommittees and Writing Groups

The N15 Subcommittees are responsible for preparing, maintaining, and submitting to the N15 Board of Officers meeting minutes, participant rosters and annual reports, and for coordinating the efforts of writing groups which are placed under their purview. Writing Groups are responsible for preparing and maintaining documentation to confirm compliance with the requirements contained in these procedures. Writing Groups are also responsible for submitting to the N15 Board of Officers a new/revised draft standard for ASC N15 consideration, per the relevant paperwork that initiated the standards action for which the Writing Group is responsible. An N15 Standards Development Checklist was developed as an optional tool and internal guideline to assist the N15 Board Officers, writing team liaison, and writing

groups with the standards development process and actions initiated after approval of the 2009 N15 Operating Procedures.

f) Consensus Body Ballot Roster

Members of the N15 Consensus Body Ballot Roster shall consist of organizations, companies, government agencies, and individuals having a direct and material interest in the activities of ASC N15. The N15 Consensus Body Ballot Roster comprises the voting members of the ASC N15 Consensus Body. The selection, addition, or termination of members, along with their interest category, shall be subject to approval by a majority vote of the Consensus Body Ballot Roster. The N15 Board of Officers will review the activity level of all Consensus Body Ballot Roster members biennially and submit to the Consensus Body Ballot Roster members for ballot vote the addition of under-represented interest groups or the deletion of inactive members.

The N15 Secretariat shall maintain the Consensus Body Ballot Roster and shall distribute it to each Ballot Roster member at least annually and otherwise upon request. The Consensus Body Ballot Roster shall include the following:

1. The Title of ASC N15 and its numerical designation;
2. The scope and purpose of ASC N15;
3. The name of the sponsoring organization [Secretariat];
4. Names and addresses of the N15 Board of Officers (Chair, Vice-Chair, Secretary);
5. Names of member organizations or agencies represented with their addresses and business affiliations. In the case of individual members, the name, address, and business or professional affiliation shall be given, as applicable; and
6. Position (officer or member) and interest category.

g) Application Process

A request for ballot (voting) membership on the consensus body shall be addressed in writing to the secretariat and shall indicate the applicant's direct and material interest in ASC N15 work, qualifications and (if applicable) a statement that the applicant's employer supports the applicant's participation. In addition, if the applicant is an organization, company, or government agency, it shall identify a representative (and an alternate, if desired).

In recommending that an application for Consensus Body Ballot Roster membership be submitted to the Consensus Body Ballot Roster for ballot vote and approval, the N15 secretariat shall consider the:

1. Need for active participation by each interest group;
2. Potential for imbalance by a single interest category;
3. Extent of interest expressed by the applicant and the applicant's willingness to participate actively;
4. Extent to which the organization of the individual supports their participation; and,
5. Reasonable limits of Ballot Roster size to insure effective deliberation and interchange.

A request for general (non-voting) membership does not require a statement of qualifications. Membership is generally open to all American members with an interest in the activities of ASC N15.

1.3 Principal Accountabilities

The ASC N15 holds the following principal accountabilities.

- Accountable to ANSI, to operate in accordance with its requirements for accreditation and in accordance with approved operating procedures;
- Accountable to the Institute of Nuclear Materials Management (N15 Secretariat), to advance the effective and efficient protection, control, and accounting of nuclear materials within the United States; and
- Accountable to ANSI, to assure effective coordination of N15 activities with the international standards development community.
- Accountable to communicate, via N15 Standards Activities Reports and other periodic

communications and reports as appropriate to: ANSI; N15 members; the INMM Executive Committee; the Journal of Nuclear Materials Management (published by the INMM); and others, as requested.

1.4. Primary Interfaces

- N15 membership (e.g., subcommittees, writing groups, and Consensus Body Ballot Roster);
- Other INMM Technical Committees;
- INMM Executive Committee members and Technical Division chairs;
- ANSI representatives;
- U.S. Technical Advisory Group for ISO-TC85;
- Other Standards Developers (primarily the American Nuclear Society and the American Society for Testing and Materials); and
- U.S. entities (e.g., industry, government contractors, academia) with responsibilities relevant to the scope of N15.

1.5. Applicability of Procedures

The procedures contained herein define the operational processes and organizational structure of ASC N15 (N15), which is sponsored by the Institute of Nuclear Materials Management (INMM). For any clarifications concerning these procedures, please contact the N15 Chair, Vice Chair, or Secretary.

2.0 INMM ASC N15 ESSENTIAL REQUIREMENTS FOR DUE PROCESS AND BENCHMARKS

ASC N15 shall follow *ANSI Essential Requirements: Due Process Requirements for American National Standards*, Clauses 1.0 and 2.0; except where noted and described below. This section contains information specific to the N15 implementation of the ANSI Essential Requirements, and articulates the normative policies and administrative procedures associated with the N15 process.

2.1 Openness of N15

Participation in the activities of N15 shall be open to all persons who are directly and materially affected by the activity in question. There shall be no undue financial barriers to participation. Membership on the Consensus Body Ballot Roster shall not be conditional upon membership in any organization. N15 shall canvass the INMM membership, the U.S. Department of Energy (DOE), and the U.S. Nuclear Regulatory Commission (NRC) at a minimum when seeking members of the Consensus Body Ballot Roster. The Consensus Body Ballot Roster shall be reviewed for openness and balance. Changes to the Consensus Body Ballot Roster shall be voted on and approved by the consensus body at least biennially.

2.2 Lack of Dominance within N15

The standards development process shall not be dominated by any single interest category, individual or organization. Definitions for each of the interest category groups applicable under the ASC N15 procedures are provided below in Section 2.3, and Annex A, Definitions. Dominance means a position or exercise of dominant authority, leadership, or influence by reason of superior leverage, strength, or representation to the exclusion of fair and equitable consideration of other viewpoints.

If it is claimed in writing (including electronic communications) by a directly and materially affected party that a single interest category, individual or organization dominated the standards development process, N15 will test or evaluate the lack of dominance. Additionally, the annual evaluation of the Consensus Body Ballot Roster membership will include a determination of the lack of dominance; if dominance is emerging, the ballot roster will be updated to remove that dominance.

2.3 Balance and Interest Categories for N15

As described in the discussion above, the N15 standards development process must strike a balance of interests. Participants from diverse interest categories shall be sought with the objective of achieving balance. This shall be a consideration in the formation and revision of Subcommittees and writing groups as well as in the makeup of the Consensus Body Ballot Roster.

The criteria for balance are that no single interest category constitutes a majority of the membership of the ballot roster. N15 will strive to maintain the ANSI criteria for balance, namely that a) no single interest category constitutes more than one-third of the membership of a consensus body dealing with safety-related standards or b) no single interest category constitutes a majority of the membership of a consensus body dealing with other than safety-related standards.

In defining the interest categories appropriate to N15 standards activity, consideration was first given to those categories as defined by *ANSI Essential Requirements* [See Annex A, Definitions, "User (ANSI)"]. The interest categories appropriate to the development of consensus in ASC N15 standards activity are a function of the nature of the standards being developed and are defined as follows:

- SDO (N15): 1) A Standards Developing Organization [Examples include: American Nuclear Society (ANS), American Society for Testing and Materials (ASTM)], and 2) the organization responsible for drafting the consensus standard, in the context of the N15 subcommittees and writing groups.
- DOE-Regulated Facility (N15): Representatives of facilities at which the protection, control, and accounting of special nuclear materials is regulated by the U.S. Department of Energy.
- NRC/State-Regulated Facility (N15): Representatives of commercial companies at which the protection, control, and accounting of special nuclear materials is regulated by the U.S. Nuclear Regulatory Commission (NRC licensee) or by an NRC Agreement State (Agreement State licensee).
- Members-at-Large (N15): Individuals with a material interest in the matters of N15 that have substantial expertise in nuclear material safeguards and security, and also have extensive experience in the activities of N15 and standards development. These individuals bring an integrating function to the interest groups of N15, as well as help to retain institutional memory and share lessons learned.
- Regulator [Federal Regulatory Agency] (N15): An authority or system of authorities designated by the U.S. government as having legal authority for conducting the regulatory process, including issuing authorizations, and thereby regulating the protection, control and accounting of special nuclear materials in all phases of the nuclear fuel cycle. (Examples: DOE, NRC)
- Standards and Testing Laboratory (N15): 1) A U.S. organization responsible for developing and issuing national level physical and/or chemical certified standards supporting the protection, control and accounting of special nuclear materials in all phases of the nuclear fuel cycle [NBL, NIST].

ASC N15 definitions shall be available upon request. Appropriate, representative user views shall be actively sought and fully considered in N15 standards activities. Whenever possible, user participants shall be those with the requisite technical knowledge. N15 shall strive to achieve user participation from both individuals and representatives of organized groups.

2.4 Coordination and Harmonization

Good faith efforts shall be made to resolve potential conflicts between and among existing American National Standards and candidate American National Standards. To meet this requirement N15 writing group chairs shall, at the beginning stage of initiating a standards action and before submitting a PINS form, review the websites of the ANSI, ISO, ASTM, INMM, American Nuclear Society, and the International Atomic Energy Agency to determine if standards exist that may pose conflicts or duplication. Once a determination has been made that no conflict exists, or that identified potential conflicts have been addressed as specified in Section 2.4.2, the writing group chair or writing team liaison will confirm such determination by submitting a written statement (e.g. email) to the N15 Secretary. It may be documented on the N15 Standards Development Checklist by checking the appropriate box.

2.4.1 Definition of Conflict (found also in Annex A).

Conflict within the American National Standard process refers to a situation where, viewed from the perspective of a future implementer, the terms of one standard are inconsistent or incompatible with the terms of another standard such that implementation of one standard under terms allowable under that standard would preclude proper implementation of the other standard in accordance with its terms.

2.4.2 Coordination/Harmonization.

INMM ASC N15 shall make a good-faith effort to resolve potential conflicts and to coordinate standardization activities intended to result in harmonized American National Standards. A “good faith” effort shall require substantial, thorough and comprehensive efforts to harmonize a candidate ANS and existing ANSs. Such efforts shall include, at minimum, compliance with all relevant sections of these operating procedures and the *ANSI Essential Requirements*. ASC N15 shall retain evidence of such efforts in order to demonstrate compliance with this requirement to the satisfaction of the appropriate ANS body.

2.5 Notification of N15 Standards Development and Coordination

At the initiation of a project to develop, revise, or withdraw an American National Standard¹ under periodic maintenance, the N15 Board of Officers shall notify ANSI using the Project Initiation Notification System (PINS) form, or its equivalent, for announcement in *Standards Action*. The notification shall include, if it is the case, a statement of intent to submit the standard for consideration as an ISO or ISO/IEC JTC-1 standard. A PINS form shall also be submitted to ANSI in connection with the decision to maintain an ANS under the stabilized maintenance option. To enable PINS submittal, the writing group chair shall provide to the N15 Board of Officers: 1) the title and (if any) designation of the standard, 2) the type of action requested (e.g., issue new standard, reaffirm existing standard), 3) an explanation of the need for the standard, 4) a description of the scope and content of the standard, 5) a list of project stakeholders, and 6) discussion of the potential for duplication or conflict with other consensus standards. A PINS form may be submitted, but is not required, at the initiation of a project to reaffirm an American National Standard.

Notification of a proposed new, revised or reaffirmed standard, or a proposal to withdraw approval from an existing standard, shall be transmitted to ANSI using the BSR-8 form, or its equivalent, for listing in *Standards Action*, in order to provide opportunity for public comment. If it is the case, then a statement of intent to submit the standard for consideration as an ISO or ISO/IEC JTC-1 standard shall be included as part of the description of the scope summary that is published in *Standards Action*.

Notification of N15 standards activity shall be announced in additional suitable media as deemed appropriate by the N15 Chair, to demonstrate the opportunity for participation by all directly and materially affected persons. For example, ASC N15 may publish notifications of standards activities through the N15 Secretariat, INMM, including: in the INMM Journal, on the INMM Website, through the electronic newsletter entitled “INMM Communicator” and via email distribution to the membership of ASC N15 and the INMM MC&A Technical Division. Additionally, periodic reports shall be provided to the members of INMM during Annual and Regional INMM Meetings. Notification shall be provided in the INMM Annual Report, which is distributed at the INMM Annual Meeting. Beyond the above process, INMM ASC N15 will adhere to the notification procedures as stated in *ANSI Essential Requirements*, Clause 2.5, *Notification of Standards Development and Coordination*.

2.6 Consideration of Views and Objections

Prompt consideration shall be given to the written views and objections of all participants, including those commenting on the PINS announcement or public comment listing in *Standards Action*. When the balloting has been closed, the N15 Secretary shall forward the ballot results to the concerned subcommittee or writing group, with copy to the N15 Board of Officers. The ASC N15 Chair shall determine whether the expressed comments and objections shall be considered by the writing group chair or at a subsequent N15 meeting.

¹ Including the national adoption of ISO and IEC standards as American National Standards.

- Editorial and other comments accompanying a statement of approval shall generally be addressed by the writing group chair by correspondence or telephone conference of the writing group. The writing group chair shall return the edited standard and a table documenting comment disposition to the N15 Board of Officers. The Board shall determine whether comments and objections have been satisfactorily addressed and whether resulting changes to the balloted standard are substantive, and shall submit the revised standard to a new ballot and public review or to ANSI for approval as an ANS, as appropriate.
- The N15 Board of Officers shall assist the writing group chair in resolving objections which, in the view of the ASC N15 Chair, are substantive or demonstrate lack of consensus.

A concerted effort to resolve all expressed objections accompanied by comments related to the proposal under consideration shall be made, and each objector shall be advised in writing (including electronic communications) by the writing group chair or N15 Chair (as appropriate) of the disposition of the objection and the reasons therefore. Each unresolved objection and attempt at resolution, and substantive changes made in the proposed American National Standard shall be reported to the N15 Consensus Body Ballot Roster in order to afford all members of the Ballot Roster an opportunity to respond, reaffirm, or change their vote. If resolution is not achieved, each such objector shall be informed in writing that an appeals process exists, per Section 2.8 below and provided with contact information.

When this process is completed, the N15 Board of Officers may consider any comments received subsequent to the closing of the public review and comment period, or consider them in the same manner as a new proposal. Timely comments that are not related to the proposal under consideration shall be documented and considered in the same manner as submittal of a new proposal. The submitter of the comments shall be so notified.

2.7 Evidence of Consensus and Consensus Body Vote

Evidence of consensus in accordance with these requirements and the accredited procedures of the standards developer shall be documented. Consensus is demonstrated, in part, by a vote of the Consensus Body Ballot Roster. Votes for the approval of a document, or portion thereof as a candidate ANS may be obtained by letter, fax, recorded votes at a meeting or electronic means. All members of the Consensus Body Ballot Roster shall have the opportunity to vote. When recorded votes are taken at meetings, members who are absent shall be given the opportunity to vote.

2.7.1 Vote. Each ballot roster member shall cast one vote in one of the following fashions:

1. Affirmative;
2. Affirmative, with comment;
3. Negative, with reason (if possible, with specific wording or actions that would resolve the objection);
4. Abstention, with reasons.

For votes on membership and officer-related issues, the yes/no/abstain method of voting shall be followed.

2.7.2 Voting Period. The voting period shall end six weeks from the day of issue or as soon as all ballots are returned, whichever is earlier. N15 Board of Officers shall send follow-up correspondence (reminder) to its consensus body members who have not returned their ballots within 10 days of the close of the ballot. An extension of up to six weeks may be granted at the option of the N15 chair.

2.7.3 Actions Requiring Approval by a Majority. The following actions require approval by a majority of the ballot roster, either at a meeting or by letter ballot:

1. Confirmation of the N15 Chair and Vice-Chair officers appointed by the N15 Secretariat (INMM);
2. Formation of a subcommittee, including its scope;
3. Disbandment of a subcommittee;
4. Withdrawal of an existing standard;
5. Addition or termination of a Consensus Body Ballot Roster member.

Minutes may be approved by a majority of members present at a meeting.

2.7.4 Actions Requiring Approval by a Majority of the Ballot Roster Membership and Two-Thirds of Those Voting.

The following actions require a letter ballot or an equivalent formal recorded vote, with approval by at least a majority of the membership and at least two thirds of those voting, excluding abstentions:

1. Approval of a new standard or reaffirmation of an existing standard;
2. Revision or addendum to part or all of a standard;
3. Submission to ANSI of change of ASC N15 scope;
4. Termination of ASC N15;
5. Change of the N15 Secretariat.

The vote must include a response by all designated regulators on the ballot roster. The regulator shall name both a primary and secondary representative for the N15 ballot. If neither the primary or secondary are reachable during a ballot voting period, ASC N15 will petition the regulator for a designated representative. ASC N15 shall follow Clause 2.7 *ANSI Essential Requirements* for specifically addressing a change in vote and a negative vote, with or without comments.

2.8 Appeals

Persons who have directly or materially affected interests and who have been or who may be adversely affected by a procedural action or inaction of ASC N15 or the N15 Secretariat shall have a right to appeal.

2.8.1 Complaint. The appellant shall file a written complaint with the N15 Secretariat within thirty days after the date of notification of action or at any time with respect to inaction. The complaint shall state the nature of the objections including any adverse effect, clauses of the procedures or the standard that is at issue, actions or inactions that are at issue, and the specific remedial actions that would satisfy the appellant's concerns. Previous efforts to resolve the objections and the outcome shall be noted.

2.8.2 Response. Within thirty working days after receipt of the complaint, the respondent (chair or secretariat representative) shall respond in writing to the appellant addressing each allegation of fact in the complaint to the extent of the respondent's knowledge.

2.8.3 Hearing. If the appellant and the respondent are unable to resolve the written complaint informally in a manner consistent with these procedures, the N15 Secretariat shall schedule a hearing by an appeals panel on a date which is agreeable to all participants, giving at least fourteen working days notice.

2.8.4 Appeals Panel. An Appeals Panel shall be appointed by the N15 Secretariat, consisting of three individuals who have not been directly involved in the matter of dispute and who will not be materially or directly affected by any decisions made or to be made.

2.8.5 Conduct of the Hearing. The appellant has the burden of demonstrating adverse affects, improper actions or inactions, and the efficacy of the requested remedial action. The respondent has the burden of demonstrating that ASC N15 and the N15 Secretariat took actions in compliance with these procedures and that the requested remedial action would be ineffective or detrimental. Each party may adduce other pertinent arguments, and members of the Appeals Panel may address questions to individuals. Robert's Rules of Order (latest edition) shall apply to questions of parliamentary procedure for the hearing not covered herein.

2.8.6 Fees. The INMM ASC N15 Secretariat charges a fee of \$1,000 to the appellant for the costs associated with resolving a procedural appeal due to the actions or inactions of ASC N15. ASC N15 Secretariat will consider a written request for an appeals fee waiver or fee reduction on a case-by-case basis.

2.8.7 Decision. The Appeals Panel shall render its decision in writing within thirty working days, stating finding of fact and conclusions, with reasons thereof, based on a preponderance of evidence presented to the appeals panel. The appellant will receive a written copy of the panel's decision. Consideration shall be given to the following positions, among others, in formulating the decision:

1. Finding for the appellant, remanding the action to the N15 Board of Officers or N15 Secretariat (INMM Executive Committee) with a specific statement of the issues and facts in regard to which fair and equitable action was not taken;
2. Finding for the respondent, with a specific statement of the facts that demonstrate fair

- and equitable treatment of the appellant and the appellant's objections;
3. Finding that new, substantive evidence has been introduced, and remanding the entire action to the N15 Board of Officers or the N15 Secretariat (INMM Executive Committee) for appropriate reconsideration.

2.9 Amendment of Operating Procedures. Written proposals to amend these procedures may be submitted to the N15 Board of Officers by the representative of any member organization, or by an individual member of INMM ASC N15. The N15 Board of Offices shall submit new and revised N15 Operating Procedures to the INMM Secretariat for approval. The INMM Secretariat shall submit new and revised N15 Operating Procedures to ANSI for approval.

2.10 Parliamentary Procedures. On questions of parliamentary procedure not covered in these procedures, Robert's Rules of Order (latest edition) may be used to expedite due process.

3.0 NORMATIVE American National Standards POLICIES for INMM ASC N15

ASC N15 shall comply with the normative policies contained in the *ANSI Essential Requirements* (ER), Clause 3.0, *Normative American National Standards Policies*. In accordance with ANSI ER Clause 3.0, N15 has chosen to: 1) include the Clause 3.0 text, as appropriate, in their accredited procedures, along with any additional information as required; and in specific cases as identified below: 2) submit to ANSI a written statement of full compliance with certain policies in addition to policy statements that satisfy the requirements set-forth in this clause.

3.1 N15 Patent Policy (Inclusion of Patents in American National Standards)

In accordance with the ANSI Essential Requirements for the development and coordination of American National Standards, ASC N15 formally adopts the ANSI patent policy as stated in Clause 3.1 of the ANSI Essential Requirements and agrees to adhere to the patent procedures set forth therein.

3.2 N15 Metric Policy

ASC N15 shall have on file at ANSI a metric policy. N15 recognizes that International System of Units (SI) are the preferred units of measurement in American National Standards. The N15 metric policy is, in cases when measurement units must be specified within a standard, to use the International System of Units (SI) as described in the ISO 31 series of standards. In cases where measurement units typically used by the U.S. audience of a particular standard differ from the SI unit, the commonly used measurement unit will be provided in parentheses next to the SI unit. Conversion factors will be included in an Appendix to the standard, as applicable.

3.3 N15 Interpretations Policy

ASC N15 shall have on file at ANSI an interpretations policy, which is included herein in ANNEX B, INMM ASC N15 Standards Interpretation Policy. Official interpretations of N15 Standards shall be made only by ASC N15, the accredited standards developer responsible for maintenance of that N15 standard. ANSI shall not issue, nor shall any person have the authority to issue, an interpretation of an American National Standard in the name of the American National Standards Institute. Requests for interpretations shall be referred to the N15 Secretariat. A written copy of the N15 interpretation shall be provided to the requestor.

3.4 N15 Commercial Terms and Conditions

ASC N15 shall adhere to the current version of the ANSI Commercial Terms and Conditions Policy as specified in the *ANSI Essential Requirements*.

3.5 N15 Evidence of Compliance (Records Retention Policy)

ASC N15 shall retain records to demonstrate compliance with the *ANSI Essential Requirements* and the INMM ASC N15 Procedures. Such records shall be available for audit as directed by the ANSI Executive Standards Council (ExSC).

ASC N15 records for new, revised or reaffirmed ANSI standards under periodic maintenance shall be retained for one complete standards cycle, or until the standard is revised. N15 records for new, revised, or reaffirmed ANSI standards under stabilized maintenance shall be retained until the standard is reaffirmed, revised or subsequently reviewed in connection with the stabilized maintenance of the standard as an ANS. Records concerning withdrawals of all ASC N15 standards shall be retained for at least five years from the date of withdrawal or for a duration consistent with the audit schedule.

3.6 N15 Antitrust Policy

ASC N15 shall adhere to the current version of the ANSI Antitrust Policy as specified in the *ANSI Essential Requirements*.

4.0 NORMATIVE American National Standards ADMINISTRATIVE PROCEDURES for INMM ASC N15

ASC N15 shall follow the administrative and processing requirements associated with the American National Standards process, as specified in *ANSI Essential Requirements*, Clause 4.0. This section of the ANSI ER describes the accreditation of American National Standards developers, and ANSI approval of developer actions in connection with American National Standards. Requirements unique to ASC N15 are specified below.

4.1 N15 Maintenance of American National Standards

INMM ASC N15 shall maintain American National Standards by one of two options – periodic maintenance or stabilized maintenance, except in the case of the adoption of ISO or IEC standards as American National Standards, when the maintenance provisions contained in the *ANSI Procedures for the National Adoption of ISO or IEC Standards as American National Standards* shall apply. ASC N15 will have the option of following ANSI's expedited procedures set forth in *ANSI Procedures for the National Adoption of ISO or IEC Standards as American National Standards* for the identical adoption of an international standard if circumstances warrant. ANSI ER criteria for periodic maintenance and stabilized maintenance are provided in Annex A, Definitions. Maintenance requirements under each option are provided in the *ANSI Essential Requirements*.

4.1.1 Discontinuance of a standards project.

N15 shall notify ANSI in writing when a decision is made by N15 to discontinue a standard development project for a new or revised American National Standard. Justification shall be provided by N15 to any interested party upon receipt of their written request, in accordance with *ANSI Essential Requirements*.

5.0 REFERENCES

ANSI Essential Requirements, [Copyright by the American National Standards Institute (ANSI), 25 West 43rd Street, 4th Floor, New York, New York 10036], current edition.

ANSI Appeals Board Operating Procedures, current edition.

ANSI Auditing Policy and Procedures, current edition.

Annex B, ANSI Reporting Format for pre-audit use [Annex B Self-audit reporting format], current edition.

Audit Process – Summary Flow [ANS Audit Flow Slide], current edition.

ANSI Procedures for the National Adoption of ISO and IEC Standards as American National Standards, current edition.

ANSI Tips and Recommended Best Practices for ANSI-Accredited Standards Developers. Compliance Reference Guide *ANSI Essential Requirements (2010 Edition)*, or current edition.

American National Standards (ANS) Forms - Guidance [ANSI guidance for on-line forms -PINS, BSR-8 and BSR-9 forms, ansi.org], current edition

ANSI Style Guide-sheet- 2003, or current edition

ANSI Patent Policy Guidelines, current edition

ANSI PINS Process: An Informative Summary (2013), or current edition

INMM ASC N15 Standards Action Checklist and Internal Guideline (N15 Checklist for Development or Revision of Standards), current edition

ANNEX A: Definitions

- ANS: American National Standard.
- ANSI Accreditation: The approval by the ANSI Executive Standards Council (ExSC) of the written procedures submitted by ASC N15 relative to the development and documentation of evidence of consensus in connection with standards that are expected to be approved as American National Standards. Accreditation by ANSI signifies that the procedures submitted by N15 satisfy the essential requirements contained herein.
- ANSI Audited Designator: An Audited Designator is an ANSI-accredited standards developer to whom the ANSI Executive Standards Council has granted the authority to designate their standards as American National Standards without such standards being reviewed and approved by the ANSI Board of Standards Review, but such developer is subjected to additional audits.
- ASC: ANSI-Accredited Standards Committee.
- ASD: ANSI-Accredited Standards Developer.
- BSR: ANSI Board of Standards Review.
- Conflict: Within the ANS process, conflict refers to a situation where, viewed from the perspective of a future implementer, the terms of one standard are inconsistent or incompatible with the terms of the other standard such that implementation of one standard under terms allowable under that standard would preclude proper implementation of the other standard in accordance with its terms.
- Consensus: Consensus means substantial agreement has been reached by directly and materially affected interests. This signifies the concurrence of more than a simple majority, but not necessarily unanimity. Consensus requires that all views and objections be considered, and that an effort be made toward their resolution.
- Consensus body: The group that approves the content of a standard and whose vote demonstrates evidence of consensus (ASC N15).
- Continuous maintenance: Continuous maintenance is defined as the maintenance of a standard by consideration of recommended changes to any part of it according to a documented schedule for consideration and action by the consensus body.
- DOE: The U.S. Department of Energy.
- DOE-Regulated Facility (N15): Representatives of facilities at which the protection, control, and accounting of special nuclear materials is regulated by the U. S Department of Energy.
- IEC: International Electrotechnical Commission.
- INMM: The Institute of Nuclear Materials Management, also the official Secretariat of ASC N15.
- ISO: International Standards Organization.
- Members-At-Large (N15): Individuals with a material interest in the matters of N15, that have substantial expertise in nuclear material safeguards and security, and also have extensive experience in the activities of N15 and standards development. These individuals bring an integrating function to the interest groups of N15, as well as help to retain institutional memory and share lessons learned.
- NRC: The U.S. Nuclear Regulatory Commission.
- NRC/State-Regulated Facility (N15): Representatives of commercial companies at which the protection, control, and accounting of special nuclear materials is regulated by the U.S. Nuclear Regulatory Commission (NRC licensee) or by an NRC Agreement State (Agreement State licensee).
- Periodic maintenance: Periodic maintenance is defined as the maintenance of a standard by review of the entire document and action to revise or reaffirm it on a schedule not to exceed five years from the date of its approval as an American National Standard.
- Proxy: A written and signed document by which a voting member of a consensus body authorizes another person to vote in the member's stead, if allowed by N15's procedures.

- Regulator [Federal Regulatory Agency] (N15): An authority or system of authorities designated by the U.S. government as having legal authority for conducting the regulatory process, including issuing authorizations, and thereby regulating the protection, control, and accounting of special nuclear materials in all phases of the nuclear fuel cycle. (Examples: DOE, NRC)
- Resolved: A negative vote cast by a member of the consensus body or a comment submitted as a result of public review where the negative voter agrees to change his/her vote, or the negative commenter accepts the proposed resolution of his/her comment.
- SDO (N15): 1) A Standards Developing Organization. (Examples: American Nuclear Society, American Standards for Testing and Materials); and 2) the organization responsible for drafting the consensus standard, in the context of an N15 writing group or subcommittees.
- Secretariat: The U.S. entity or organization responsible for overseeing the ASC N15 accreditation with ANSI, compliance with ANSI procedures, and approval of the N15 Chair. The Secretariat of N15 is the Institute of Nuclear Materials Management, INMM.
- Stabilized Maintenance: A standard that is maintained under the stabilized maintenance option shall satisfy the following eligibility criteria:
 1. The standard addresses mature technology or practices, and as a result, is not likely to require revision; and
 2. The standard is other than safety or health related; and
 3. The standard currently holds the status of American National Standard and has been reaffirmed at least once; and
 4. At least ten years have passed since the approval or last revision of the standard as an ANS; and
 5. The standard is required for use in connection with existing implementations or for reference purposes.
- Standards and Testing Laboratory (N15): 1) A U.S. organization responsible for developing and issuing national level physical and/or chemical certified standards supporting the protection, control and accounting of special nuclear materials in all phases of the nuclear fuel cycle [Examples: NBL, NIST].
- Subcommittee: An approved N15 body reporting to INMM ASC N15, with a defined scope within the technical area as assigned to them by N15. The purpose of a subcommittee is to provide a venue for exchange of ideas, dialogue and issues among interested subject matter experts on topics of vested interest to N15. A Subcommittee chair is appointed by the ASC N15 Chair.
- Substantive Change: A substantive change in a proposed American National Standard is one that directly and materially affects the use of the standard. Examples of substantive changes are below:
 - “shall” to “should” or “should” to “shall”;
 - addition, deletion or revision of requirements, regardless of the number of changes;
 - addition of mandatory compliance with referenced standards.
- TAG: Technical Advisory Group. (Example: U.S. Technical Advisory Group for ISO-TC85).
- Unresolved: Either (a) a negative vote submitted by a consensus body member or (b) written comments, submitted by a person during public review expressing disagreement with some or all of the proposed standard, that have not been satisfied and/or withdrawn after having been addressed according to N15’s approved procedures.
- User (ANSI): User participation should come from both individuals and representatives of organized groups. There are several user categories:
 1. User-consumer: Where the standards activity in question deals with a consumer product, such as lawn mowers or aerosol sprays, an appropriate consumer participant’s view is considered to be synonymous with that of the individual user – a person using goods and services rather than producing or selling them.
 2. User-industrial: Where the standards activity in question deals with an industrial product, such as steel or insulation used in transformers, an appropriate user participant is the industrial user of the product.
 3. User-government: Where the standards activity in question is likely to result in a standard that may become the basis for government agency procurement, an appropriate user participant is the

representative of that government agency.

4. User-labor: Where the standards activity in question deals with subjects of special interest to the American worker, such as products used in the workplace, an appropriate user participant is a representative of labor.

Note: Further interest categories that may be used to categorize directly and materially affected persons consist of, but are not limited to, the following: a) Consumer; b) Directly affected public; c) Distributor and retailer; d) Industrial/commercial; e) Insurance; f) Labor; g) Manufacturer; h) Professional society; l) Regulatory agency; j) Testing laboratory; k) Trade association.

- **Writing Group**: Group of interested stakeholders, representing all interest categories in a balanced manner, responsible for assessing industry need for a new or revised standard, preparing a draft new or revised standard for consideration, and evaluating for potential conflict-of-interest with other ANSs. A writing group will operate for a succinct time frame resulting in balloting of a draft new or revised standard. After the standard is balloted, N15 will consider if further interest warrants formation of a subcommittee, or continuation of the writing group or disbandment of the writing group. Formation or disbandment of a writing group requires the approval of the N15 Chair. The N15 Chair will also identify, if applicable, placement of the writing group within a Subcommittee.

ANNEX B: INMM ASC N15 Standards Interpretation Policy

When INMM ASC N15 receives a written request for an interpretation of an N15 Standard, the following steps will be followed to address the request:

- 1) The N15 Secretary (or other N15 Board Officer), shall contact the individual or group requesting the interpretation to let them know the interpretation is being prepared and should be available in approximately one month.
- 2) The N15 Secretary (or other N15 Board Officer) shall contact the Chair of the Subcommittee (or writing group, if applicable, in all cases where Subcommittee is used in this section) of that standard and request that the Subcommittee prepare and provide an interpretation within 3 weeks.
 - a) The Subcommittee chair shall prepare an interpretation or assign the task to a Subcommittee member.
 - b) All reachable members of the Subcommittee shall be given one week to review and comment on the interpretation. If no comment is received, agreement will be assumed, and the interpretation will stand.
 - c) If comments are sent, they must be incorporated or resolved, and the final version resubmitted for a one-week review by the Subcommittee.
 - d) The Subcommittee chair shall forward the interpretation to the N15 Chair as soon as it is received from the Subcommittee, and the N15 Chair shall then provide a written response to the requestor.
- 4) If the Subcommittee cannot reach agreement on an interpretation, the Secretariat of N15 shall consider the matter and determine the resolution.
- 5) In case the chair of the Subcommittee is not reachable, the N15 Secretary (or other N15 Board Officer) will make an effort to reach other members of the Subcommittee.
 - a) The Secretary will appoint a member to be responsible for drafting the interpretation and soliciting comment from the other members.
 - b) The members of the Subcommittee and the Secretariat of N15 must be given one week to review the interpretation and provide comment. No comment shall indicate agreement.
 - c) The final interpretation will be submitted to the N15 Chair, who will then provide a written response to the requestor.
- 6) Should no members of the original Subcommittee or writing group be reachable, the Secretariat of N15 will prepare an interpretation and submit it for peer review to a group of at least four subject matter experts representing each of the interest groups of N15. After incorporating their comments and reaching agreement by majority vote, a copy of the final interpretation will be provided to the requestor by the N15 Chair.
- 7) The process to develop the interpretation and a copy of the final interpretation shall be documented and retained in the N15 files for as long as the standard is active, and for at least five years after the standard is withdrawn or revised.