



CONFERENCE OF RADIATION CONTROL PROGRAM DIRECTORS, INC.

RESOLUTION

Relating to: Improving federal and state rule-drafting cooperation.

- WHEREAS:** One of the stated objectives of the Conference of Radiation Control Program Directors, Inc. (CRCPD), is "to encourage and promote cooperative enforcement programs with federal agencies and between related enforcement agencies within each state;" and
- WHEREAS:** Another of the stated objectives of the CRCPD is "to promote and foster uniformity of radiation control laws and regulations;" and
- WHEREAS:** Federal rule-writing staff respond to individual comments and hold key discussions determining the basic scope, as well as the detail of the rule, internally without peer consideration by the states; and
- WHEREAS:** Federal rule-writing staff may be unaware of special situations in the various states which could be better served by taking a different regulatory approach and may go on to make rules final which may preclude states from developing different, but otherwise acceptable, methods of achieving the same purpose; and
- WHEREAS:** The outcome of a discussion by a diverse group generally results in a better product than that which follows individual reviews; and
- WHEREAS:** The opportunity provided recently by the U.S. Nuclear Regulatory Commission (NRC) for their "QA" rule-writing team to interact with state representatives at a series of meetings has resulted in improved understanding of states' various positions by both the U.S. NRC and state representatives and has had a positive effect upon the rule under consideration;
- WHEREAS:** The CRCPD recognizes that the U.S. NRC "QA" rule is an Agreement State matter, addressed by that organization in a recommendation in its Task Force on Compatibility Report, dated March 7, 1991;

NOW, THEREFORE, BE IT RESOLVED:

That the Office of Executive Director of the CRCPD, as a representative of all states, offers to work with the Organization of Agreement States and the various federal agencies to provide time at the annual meeting for the specific, substantial discussion of rule-making initiatives currently under consideration by federal agencies or individual state members; and

BE IT FURTHER RESOLVED:

That the CRCPD specifically encourages the participation of federal agency staff in working cooperatively with the states in a peer relationship to build consensus; and

BE IT FURTHER RESOLVED:

That the Office of Executive Director of the CRCPD and participating federal agencies provide working sessions of sufficient length to adequately discuss details of any major rule-making initiatives and the opportunity to provide meaningful input to rule-writing at the time of the annual meeting. The Executive Board, consulting with the Organization of Agreement States and the federal liaison officers, shall determine the specific initiatives of greatest importance to members of the CRCPD.

Original signed by Diane E. Tefft, CRCPD Chairperson
Accepted by the CRCPD Membership on: 5/11/91

The Executive Board recommends passage of this resolution by CRCPD membership, 5/10/91.