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To: Roy Zimmerman
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Subject: Interim Review/Approval Process for Issuing Documents

The interim review/approval process for sensitive information was developed to provide RES staff with an easy, reliable, and consistent method to (1) review the backlog of RGs and NUREGs to be web posted and/or paper published to determine if they contain sensitive information, and (2) approve those documents that do not contain sensitive information for paper publication and posting to the NRC public web site.

Once the backlog of RGs and NUREGs has been addressed, the routine forward process will incorporate the sensitivity review as a normal component and this additional review/approval process will no longer be needed.

The steps in the interim process are:

1. The Technical Monitor performs an indepth review of the document to determine if it contains sensitive information [At this time, interim guidance for identifying sensitive information is contained in COMSECY-01-0030, "Guidance to the Staff on Release of Information to the Public"]. The Technical Monitor e-mails the results of the review to the cognizant Branch Chief with a recommendation that the document be issued or withheld (reasons included).

The Technical Monitor provides the primary technical review and makes the initial decision to publish or not publish. The Technical Monitor's review is based on a close read of the document.

2. The Branch Chief reviews the recommendation, and, as necessary, reviews the document and discusses the recommendation with the Technical Monitor. If in agreement with the Technical Monitor's recommendation, the Branch Chief will forward an e-mail to the Division Director confirming the recommendation to publish. If in disagreement, the Branch Chief will resolve differences, if possible, with the Technical Monitor and will forward an e-mail to the Division Director recommending release or the continuing basis for the difference.

The Branch Chief contributes a technical QA on the results of the Technical Monitor, promotes a level of uniformity of reviews/recommendations from within the branch, and reconciles, if possible, any difference of opinion with the Technical Monitor. The Branch Chief's review is generally based on an overview of the document and the Technical Monitor's recommendation.

3. The Division Director reviews the recommendation forwarded by the Branch Chief. If in support of the recommendation, the Division Director forwards the e-mail trail with indication of approval to the RES Web Liaison who will request that OCIO publish the document (web or paper). If the Division Director disagrees with the recommendation, a resolution should be achieved with the Branch Chief and Technical Monitor. If a resolution can not be achieved, the issue should be raised to the DD:RES.

The Division Director contributes the ability to ensure a consistent process within the Division across all branches, and to consider information from a broad range of sources. The Division Director's approval is to ensure that the defined process through Branch Chief has been achieved, that there has been, if necessary, a resolution of differences, and that additional information known to the Division Director does not affect the Branch Chief's recommendation.

Additional information: The interim process requires approval of the sensitivity review at the Division Director level. This is equal to or less than the level required by the "normal concurrence" process for release of RGs or NUREGs with one exception. NUREG/CRs can be approved for release at the Branch Chief level. The interim process requires Division Director approval for all NUREG type documents, therefore the interim process imposes an additional review at the Division Director level for NUREG/CRs. Since the technical NUREG/CRs may have a greater chance of containing sensitive information than staff

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NUREGs, particularly during this interim (learning) period, the additional review may not be unreasonable.

CC: Mabel Lee