

CONTROL OF OPERATOR LICENSING GUIDANCE DOCUMENTS

A. PURPOSE

The purpose of this Operator Licensing Manual Chapter (OLMC) is to outline the requirements for revising and issuing the following operator licensing guidance documents:

- NUREG-1021, *Operator Licensing Examination Standards for Power Reactors*
- NUREG-1122, *Knowledge and Abilities Catalog for Nuclear Power Plant Operators: Pressurized Water Reactors*
- NUREG-1123, *Knowledge and Abilities Catalog for Nuclear Power Plant Operators: Boiling Water Reactors*
- NUREG-2103, *Knowledge and Abilities Catalog for Nuclear Power Plant Operators: Westinghouse AP-1000 Reactors*
- NUREG-2104, *Knowledge and Abilities Catalog for Nuclear Power Plant Operators: Advanced Boiling Water Reactors*
- Operator Licensing Manual Chapters
- Operator Licensing Program Feedback Items (also referred to as FAQs)
- Regional Operator Licensing Guidance Documents

B. BACKGROUND

The NRR operator licensing (OL) program office staff and management are responsible for developing and maintaining the procedures and policies necessary to implement 10 CFR Part 55, "Operators' Licenses." The goals are to implement the regulations in a consistent, efficient, and effective manner that maintains safety and promotes public confidence, while minimizing unnecessary regulatory burden on facility licensees. To that end, the staff shall remain attentive to lessons learned and feedback from NRC operator license examiners and supervisors, facility licensees, the public, and industry groups (e.g., the Nuclear Energy Institute [NEI], the Professional Reactor Operators' Society [PROS], and the Institute of Nuclear Power Operations [INPO]).

C. INSTRUCTIONS

1. General

- a. When the need for additional or modified guidance is identified, the OL program office staff and management will use the criteria below to determine the appropriate vehicle and schedule for promulgating the required guidance.
- b. All changes to guidance must be reviewed to ensure compliance with 10 CFR 50.109, "Backfitting." Refer to NRR Office Instruction LIC-400, *Procedures for Controlling the Development of New and Revised Generic Requirements for Power Reactor Licensees*.
- c. Interim (and generally minor) publicly available guidance clarifications may be promulgated per Section C.2 below.
- d. More extensive publicly available guidance changes, enhancements, and additions will be developed in accordance with the formal revision process outlined in Section C.3 below.
- e. New internal guidance and revisions will be promulgated using the ROI process per OLMC-160, *Regional Office Interactions*, or by developing/revising the applicable OLMC, as discussed in Section C.4 below.
- f. Regional guidance documents will be controlled as discussed in Section C.5 below.

2. Interim Guidance Clarifications

- a. When the need for clarification in existing OL guidance is identified, the OL program office staff will prepare the applicable guidance, including a discussion of the issue and the rationale for the clarification. This can be accomplished through the Operator Licensing Program Feedback (OLPF) program (refer to Attachment 2 for detailed instructions on how to process an OLPF). Guidance clarifications that change or contradict an existing NUREG, that may constitute a backfit, or for which public comments would be appropriate shall be handled in accordance with the formal revision process outlined in Section C.3.
- b. Upon approval of the draft guidance by the OL program office branch chief, the staff will solicit comments (email is acceptable) from the regional OL branch chiefs and/or any other affected branch, review their comments, and incorporate recommended changes as appropriate.

Proposed guidance clarifications will generally also be discussed during a periodic OL biweekly call or, depending upon the urgency and nature of the clarifications, during an emergent OL conference call.

- c. The OL program office will generally discuss the proposed guidance clarification during a regularly scheduled public meeting with the industry operator licensing focus group (OLFG), sponsored by NEI. If urgent clarifications are generated based on communications or correspondence with the NEI counterpart, such items will be reviewed during the next focus group meeting. Refer to NRR Office Instruction COM-204, *Interfacing with Owners Groups, Vendors, and NEI*, for more information, including documentation requirements.
- d. The OL program office staff will consider, based upon the nature of the clarified guidance, the need for additional reviews by the Office of General Counsel (OGC) and other industry groups (e.g., INPO, NEI, and PROS) on a case-by-case basis before forwarding the proposal to the OL division director for approval.
- e. The OL program office staff will forward the clarified guidance via email from the OL program office branch chief to the regional OL counterparts. The memorandum will specifically address the staff's position regarding backfit and its plan for implementing the clarified guidance (e.g., that it will be implemented immediately or at some future date by placing it on the "Operator Licensing Regulations, Guidance, and Communications" webpage and into the Public Electronic Reading Room, if desired). ROI documents will generally not be made available to the public.
- f. If the guidance clarification is acceptable, the OL staff will execute the implementation plan for the guidance. As a courtesy, the OL staff will notify the NEI counterpart and other industry groups, as appropriate, when the guidance is available.

3. Formal Guidance (NUREG) Revisions

- a. When the need for new or modified guidance, that changes or contradicts an existing NUREG, that may constitute a backfit, or for which public comments would be appropriate, is identified, , the OL program office staff will develop the applicable guidance, including a discussion of the issues and the rationale for the guidance. Any interim guidance clarifications that were previously promulgated per Section C.2 above and, as appropriate, any internal guidance that was promulgated per the ROI process, will be considered for incorporation in the formal revision package.

New guidance may be promulgated by providing additional information via a supplement to an existing NUREG revision. In this case the new text would be identified with vertical bars in the right or left margins, or by publishing a completely new revision or report where similar page markings would be required.

- b. Refer to Management Directive 3.7, *NUREG-Series Publications*, and NUREG-0650, *Preparing NUREG Series Publications*, and the Office of Administration website at http://www.internal.nrc.gov/ADM/manuscriptdev_print/nuregpub.html for NUREG preparing and publication guidance and requirements. After reviewing these documents, use the checklist in Attachment 1, "Checklist for Processing a NUREG Revision," of this OLMC to assist during the major steps of the NUREG revision and publication process.
- c. Upon approval by the OL program office branch chief, the staff will forward the proposed revision to the regional OL branch chiefs for comment. The staff will review the regional comments and incorporate any recommended changes, as appropriate. The proposed changes will generally also be discussed during a OL bi-weekly conference call.
- d. Upon resolving and incorporating the regional comments, the OL program office staff will solicit and, as appropriate, incorporate technical editor comments on the proposed revision package and prepare the draft manuscript for publication and public comment.
- e. In accordance with NRR Office Instruction, ADM-200, *Delegation of Signature Authority*, the NRR office director is the official that authorizes publication of NUREGs. This may be formally delegated to the NRR DRO director. The OL program office staff will prepare NRC Form 335, "Bibliographic Data Sheet," and NRC Form 426, "Authorization to Publish a Manuscript in the NUREG Series," which must accompany the draft NUREG when it is forwarded to the NUREG publication team in ADM; Form 426 must be signed by the applicable NRC official authorizing publication (which may be the NRR DRO director or, the NRR office director). The OL program office staff will also prepare a *Federal Register* notice (FRN) announcing that the draft NUREG revision is available for public comment. The FRN, which may be signed by the OL program office branch chief, will generally indicate how a copy of the draft NUREG can be obtained (e.g., the Public Electronic Reading Room, the NRC web site, or hard copy, as appropriate), the due date for comments, who to contact with questions, and whether the guidance is being implemented

on a trial basis or pilot program. If the draft NUREG revision will be implemented on a trial basis or pilot program, the comment period must be long enough to facilitate meaningful feedback given the lead time in preparing and administering the examinations. It may be helpful to obtain a sample of a recent FRN to use as a template.

- f. Upon its approval by the applicable NRC official authorizing publication (which may be the director of DRO or the NRR office director), the OL program office staff will:
 - i. Forward the draft NUREG to ADM for final review and publication
 - ii. Forward the FRN to ADM for publication after the NUREG becomes available
 - iii. Informally notify its counterparts at NEI, INPO, and PROS that the FRN has been issued and that the draft NUREG is available for comment and trial use, if applicable
 - iv. Forward an electronic version of the draft NUREG to the NRC's web services staff, so that the draft NUREG can be posted as a document for comment on the NRC's public website (ADM staff may do this step)
 - v. Schedule public meetings or workshops to discuss the revision, if deemed appropriate by OL program office management
- g. At the conclusion of the comment (and trial use, if applicable) period, the OL program office staff will collate, review, and summarize the internal and public comments, participant feedback surveys, examination reports, and any other feedback regarding the proposed NUREG guidance changes. The staff will incorporate and justify the changes, as appropriate, and management will determine if the revision requires further review, discussion, or comment by the regional or industry counterparts or the public.
- h. When the final revision is complete, the OL program office staff will forward the NUREG to the applicable NRC official authorizing publication (which may be the NRR DRO director or the NRR office director) with a cover memorandum that specifically addresses the staff's position regarding backfit and provides a recommendation regarding the need for review by OGC and CRGR. If additional reviews are determined to be necessary, the staff will coordinate those activities, revise the NUREG as appropriate, and obtain the required concurrences.
- i. When the required concurrences are complete or determined to be unnecessary, the OL program office staff will again prepare NRC Form

335, NRC Form 426, and an FRN that announces the NUREG's availability and outlines the implementation schedule.

- j. When Form 426 is signed by the applicable NRC official authorizing publication (which may be the NRR DRO director or the NRR office director), the OL program office staff will forward the NUREG revision to ADM for final review and publication. The staff will also forward the FRN to ADM for publication after the NUREG becomes available. At that time, the staff will informally notify its counterparts at NEI, INPO, and PROS that the NUREG revision has been published and will become effective on the date specified in the FRN. In addition, the OL program office staff will forward an electronic version of the final NUREG to the NRC's web services staff, so that the final NUREG can be posted on the NRC's public website.

4. Internal Guidance Development and Revision

- a. The OL program office staff and management will exercise judgment in determining whether to promulgate internal guidance per the ROI process in OLMC-160 or by issuing/revising an OLMC. Policy questions and answers that are initially documented in an ROI may later be incorporated in an OLMC. When the need for a new or modified OLMC is identified, the OL program office staff will prepare the applicable guidance, including a discussion of the issue and the rationale for the guidance, as necessary.

Revisions to an OLMC may be promulgated by replacing selected pages, in which case the new and deleted text would be identified with vertical change bars in the right or left margins, or by issuing a completely new revision, in which case no page markings are required.

- b. Upon approval of the proposed OLMC revision by the OL program office branch chief, the staff will solicit comments (email is acceptable) from the regional OL branch chiefs, review their comments and incorporate recommended changes, as appropriate. New or modified guidance may also be discussed during a periodic OL bi-weekly meeting, or, depending upon the urgency and nature of the guidance, during an OL conference call.
- c. When all the regional inputs have been considered, the guidance clarification will be finalized. If the guidance clarification is acceptable, the OL staff will enter the guidance in the Agency-wide Document Access and Management System (ADAMS) as a public document and update the IOLB SharePoint site with the links to the "Current OLMCs."

- d. The lead OL program office staff will prepare a cover memorandum forwarding the approved revised OLMC(s) from the NRR and NRO OL branch chiefs to the regional OL branch chiefs. The cover memorandum will reference the accession numbers for the new and/or revised OLMC(s). The OL branch chief will sign the memorandum, and the OL staff will dispatch and implement the new and/or revised OLMC(s).

5. Regional Guidance Documents

The OL program office acknowledge the regions' prerogative to develop supplemental implementation guidance, as necessary, to control internal operator licensing activities. However, in order to maintain inter-regional consistency, the following must be observed:

- a. Section C of ES-1.1 of NUREG-1021 states, "[the] regional offices shall obtain program office approval before undertaking any initiative that could undermine examination consistency among the regions." Nevertheless, the regions may promulgate and implement written policies and guidance that clarify and are consistent with the intent of NUREG-1021 without prior review and approval by the NRR OL program office. However, copies of those policies and guidance should be available to the NRR OL program office and the other regional operator licensing BCs for review and consideration to promote consistency amongst regions. The OL program office will consider whether the regional guidance merits nationwide promulgation via an ROI, an OLMC, the OL website, or a future revision of NUREG-1021. The regional branch chiefs shall screen the guidance for conflicts among the regions that could undermine examination consistency and bring any potential problems to the attention of the OL program office so they can be resolved.
- b. Under no circumstances shall any region unilaterally impose expectations or requirements on facility licensees that are more demanding or restrictive than those contained in NUREG-1021.
- c. The regional policies and guidelines must include the following disclaimers: (1) that NUREG-1021 always takes precedence if a conflict is identified; (2) that anyone discovering a conflict shall promptly bring it to the attention of the issuing authority; (3) that the regional policies and guidelines do not replace or eliminate the requirements of or the need to be familiar with NUREG-1021; (4) and that the regional policies and guidelines do not impose any requirements or expectations on licensees beyond those in NUREG-1021.

- d. All regional guidance documents should include detailed cross-references to NUREG-1021, as appropriate, and be maintained current with changes and revisions to the NUREG.

D. ATTACHMENTS

Attachment 1 Checklist for Processing a NUREG Revision

Attachment 2 Checklist for Processing an OLPF

Attachment 1

Checklist for Processing a NUREG Revision

Note: Early communication with the Office of Administration (ADM) branch responsible for NUREG publishing ensures that the most current instructions are being used and helps the publishing team plan resources to support timely publishing of a NUREG. Additionally, technical editing and OGC review require advance notice and scheduling for because of the length of a NUREG.

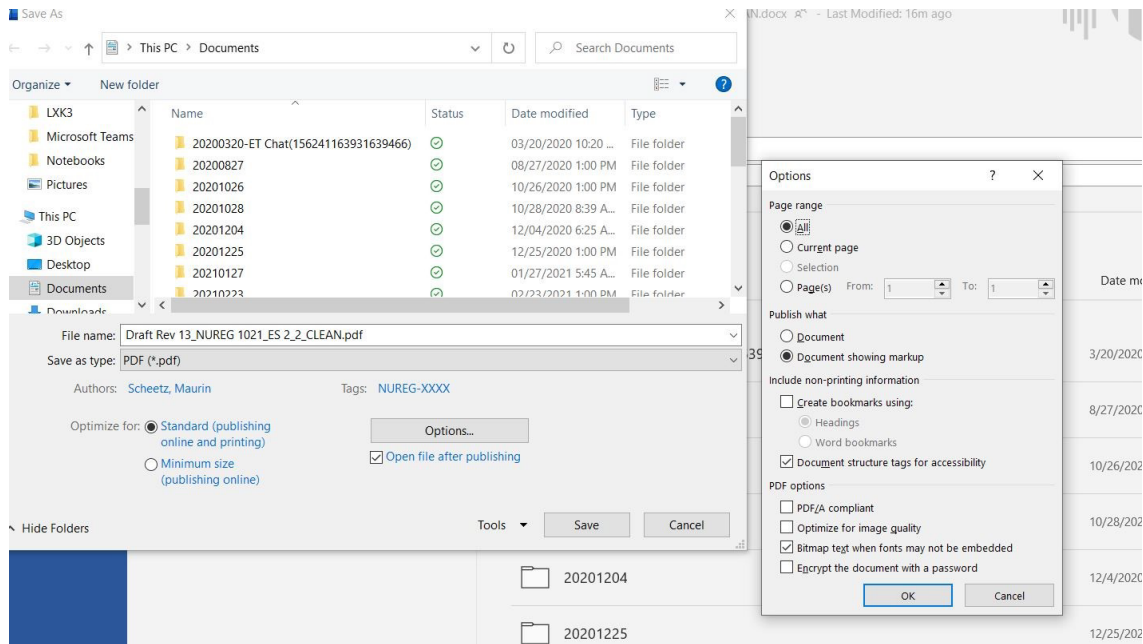
Draft NUREG for Comment

The following is a list of steps designed to assist OL program office staff who are assigned to revise a NUREG:

1. Obtain the latest NUREG template and Forms 335 and 426, from the Publications Branch in ADM ([NUREG ToolBox on the S: Share Drive](#)) and the document titled, "Preparing a Document for NUREG Publication." Review the instructions for how to prepare the NUREG and its associated forms. The NUREG template and instructions change periodically, so verify that it is the current NUREG template and instructions. Send any inquiries on NUREG publishing to NUREG.Resource@nrc.gov or contact the Publications Branch in ADM.
2. Draft the NUREG using track changes and change bars. Obtain internal comments on the draft NUREG in accordance with OLMC-110 Section C.
3. When finished creating the draft NUREG, send it to tech editing at QTE.Resource@nrc.gov. Instruct them to keep the changes tracked since this is required by ADM for publishing the NUREG. Resolve QTE comments in the NUREG. Save a copy of QTE's concurrence email for ADM review.
4. After resolving QTE comments, prepare the draft NUREG as a PDF with line numbers and change bars as follows:

In Microsoft Word, search, "show line numbers," and select one of the options that makes sense for the full document or section. Then go to the "Review" tab and find the "Tracking" area. Select the "Tracking" pane arrow, then navigate to "Advanced options," then under the "Markup" menu, select Insertions (none), and Deletions (hidden), then select "ok" twice to exit out of the tracking options. Then go to the "File" tab and select "Save a Copy" or "Save As," PDF, then click "Options" and "Document showing markup," and the track change bars ONLY will appear in the PDF where your text was changed and not the tracked changes in the document.

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5. Obtain the template for a Federal Registrar Notice (FRN) and add draft the FRN (see [OGC/Legal Research Center internal website](#), Federal Register Notice tab). The FRN for a draft NUREG for comment is different from the FRN for publishing a final NUREG; the FRN for the draft NUREG explains how the public can submit comments on the draft NUREG.
6. Send a copy of the FRN to the Legal Research Center (LRC) for an “early” review at: Notice_Publish.Resource@nrc.gov. Resolve any comments from the LRC.
7. Send the FRN to OGC’s mailroom for legal review (also known as NLO, or no legal objection). At the same time, you may ask for OMB review for Congressional Review Act (CRA) determination.¹ of major/minor rule on a draft NUREG if you believe that you will not have any significant changes due to public comments in the final draft. This will make final publication faster. Address any comments on the FRN from OGC and save the copy of the email with their NLO. Note that OGC’s NLO on the draft NUREG is typically not needed; however, it is good practice to have them review it and address their comments to make sure they won’t have any showstoppers while processing the final NUREG.
8. Complete Form 335 and Form 426 for the draft NUREG (note: NUREG-1021 and the K/A catalogs are usually “medium” priority on Form 426). To complete Form 426, send a copy of the draft NUREG and Form 426 to OCIO (currently Dave Cullison) for Paperwork Reduction Act requirement review. Ensure the draft NUREG contains the appropriate Paperwork

¹ Refer to Step 3 in the “Final NUREG” section below for instructions regarding the CRA review.

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Reduction Act statement, typically on the “Abstract” page (e.g., *PAPERWORK REDUCTION ACT STATEMENT - This NUREG contains information collection requirements that are subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). These information collections were approved by the Office of Management and Budget (OMB), approval number 3150-0018*). After OCIO signs Form 426, send a copy of the draft NUREG and Form 426 to the Director, DRO (For past revisions, the NRR Office Director has delegated authority to DRO Director to sign these forms).

8. Submit the draft NUREG and Forms 335 and 426 to ADM using the instructions in the “Preparing a Document for NUREG Publication” (refer to Step 1 above). Also, send an email to NUREG.Resource@nrc.gov to inform ADM/MGSDB staff that the NUREG report is ready and on available in their shared drive (S:drive) for their review.
9. Resolve ADM’s proposed comments and edits. You may need to back into Microsoft Word to make these edits and then recreate the NUREG as a PDF. Once ADM comments are resolved, ADM will provide a final PDF of the draft NUREG for review and approval. If any changes need to be made, let ADM know; otherwise, send ADM your approval. ADM will then enter the draft NUREG in ADAMS as publicly available. ADM will also coordinate with the NRC website contractor to post it on the NRC public website.
10. Add the FRN to ADAMS (profile as public, non-sensitive, leave date to be released blank, make OGC-PSB-LRC an owner) using FRN electronic checklist from the LRC website (ADAMS Accession No. ML17136A073).
11. When the draft NUREG is publicly available at the link on the NRC website (i.e., when everything stated in the FRN is true about availability of the NUREG), send the publication request for the FRN to the LRC for posting in the Federal Registrar (a template is available under ADAMS Accession No. ML17136A225). The LRC will route the publication request to the OL program office branch chief to sign digitally.

Public Comment Period

1. Consider the need for one or more public meetings during the public comment period, including one at the start of the public comment to share information about the major changes in the draft NUREG and how to submit public comments.
2. Public comments can be viewed using the docket number at rulemaking.gov and in ADAMs. You can set up notifications on regulations.gov to email you when comments are posted. An NRC staff member from the LRC reviews the comments first before they are posted to regulations.gov. If you want to see comments that have been submitted to the docket through the Regulations.gov website before they are posted, you will need access to FDMS (which is the non-public side of Regulations.gov). If you want access, go to fdms.gov and select the link “click here to register.” Fill out the registration form. For the last field “Access

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Level,” select Agency Viewer, then submit the form. But coordinate with LRC before you request this access. They will have to approve it.

3. A member of the public or industry may request an extension to the public comment period. If this occurs, another FRN will be required to formally communicate the extension and the date that the public comment period will close.

Final NUREG

1. At the end of the public comment period, resolve all public comments and edit the NUREG as needed. Remove the line numbers if used on the draft NUREG for comment. See the [Rulemaking Knowledge Management - Guidance by Topic - Public Comments](#) Sharepoint site which has many useful resources for public comment processing and resolution. Also, enroll in the “Advanced Training for Responding to Public Comments in Rulemaking” if available. Although NUREGs are not required to have a formal public comment resolution [table](#), it will speed up the final publication when OGC reviews the document. Note that OGC prefers to review the comment resolution in a Microsoft Word document because it is easier to provide comments and corrections. In addition, the NRC needs some method to document the comments that were received and what was done to address them. Put the comment resolution table/summary in ADAMS as publicly available.
2. Get template for the FRN for the final NUREG and edit it for the final NUREG (see [OGC/Legal Research Center internal website](#), Federal Register Notice tab). The FRN needs to provide the ML# for the public comments and staff resolution.
3. Once public comments are resolved in the NUREG, use the steps (a-d) below to get OMB determination as to whether the NUREG is a major rule or not. Although all of the Knowledge and Ability catalogs and NUREG-1021 revisions issued to date have been considered “rules” that are **NOT** major under the Congressional Review Act (CRA), OMB needs to make the determination each time we issue a final NUREG. This may take up to one month.
 - a. Complete a CRA Summary and send it to the Regulatory Analysis and Rulemaking Support Branch in NMSS (NMSS/REFS/RASB) for review and transmittal to OMB for OMB’s determination; see <https://usnrc.sharepoint.com/teams/NMSS-Congressional-Review-Act>. The OMB Desk Officer must decide of whether the final NUREG is a major rule or not. For the CRA Summary, you will need info from the most recent Part 55 OL OMB clearance – these are updated every three years, and you can find them in the “OMB clearances” folder in the IOLB folder in ADAMS.
 - b. OMB turnaround times for these major/non-major determinations should be directed to the NMSS Division of Rulemaking.

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- c. Add the appropriate statement to the NUREG once OMB determination received (e.g., added to Abstract page, "This NUREG is considered a rule as defined in the Congressional Review Act [5 U.S.C. 801-808]. However, the Office of Management and Budget has not found it to be a major rule as defined in the Congressional Review Act.")
 - d. Include the same statement in the FRN.
15. Send the final NUREG and its associated FRN to OGC mailroom for NLO. Make any needed changes. Save a copy of the NLO email for ADM to review.
16. Once you have OGC's NLO for the NUREG and FRN, then:
- a. Complete the Form 335 and Form 426 for the final NUREG (see Step 8 in the Draft NUREG section above).
 - b. Add the FRN to ADAMS (public, profile as non-sensitive, leave date to be released blank, make OGC-PSB-LRC an owner) using FRN electronic checklist from the LRC website (ADAMS Accession No. ML17136A073).
17. Submit the final NUREG and Form 335 and Form 426 to ADM (same way as discussed in Step 8 of the Draft NUREG section above). Resolve any comments from ADM and give approval on the final PDF they provide when complete. ADM will add the NUREG to ADAMS as publicly available and link it on the NRC public website where NUREGs are [listed](#).
18. Complete GAO-001 form and make three copies (the only difference is which box at the top is checked – see IOLB SharePoint site for examples). The forms are available on the [NMSS Congressional Review Act SharePoint site](#). **Before** the FRN is published and after the step 17 is complete, send the three GAO forms and the final NUREG to OCA (the NMSS/REFS/RASB point of contact will send directions on how to transmit these forms and the NUREG to OCA).
19. Complete FRN checklist using LRC's General Notices Checklist (ADAMS Accession No. ML13179A208) to add FRN to ADAMS.
20. Submit pre-publication review request (e-mail) to LRC for the FRN; a template is available under ADAMS Accession No. ML17136A225. The NUREG will need to be publicly available and also declared, and the public website will need to be updated. LRC will have the OL branch chief sign the FRN digitally. Once the OL program office branch chief signs it, the LRC will transmit the FRN to the Office of the Federal Register, and it will be published 4 days later.

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21. Update the OL portion of the NRC public website links to the NUREG if needed:
<https://www.nrc.gov/reactors/operator-licensing/regs-guides-comm.html>. Update other references and information on the OL portion of the NRC public website as needed.
22. Conduct any examiner training on the NUREG changes and, for NUREG-1021 revisions, update the Nuclepedia 1021 Toolbox Page with information about the revision. Update any associated OLMCs, RPS-OL templates, ODD forms and NRC Forms as necessary.

Attachment 2

Checklist for Processing Operator Licensing Program Feedback (OLPF)

The Operator Licensing Program Feedback program is a publicly available set of questions and answers, or “FAQs,” from individual requests for clarification about the NRC’s operator licensing guidance, policies, and issues.

The following checklist can be used to process a question and its associated OLPF:

- ☐ If the question or request already been answered in the [OLPF collection](#) (either archived or current) or is specific enough that it should not be added into the OLPF, then implement the **NOT added to OLPF** section **only**, otherwise, follow **Added to OLPF** section.

NOT added to OLPF

- ☐ (Optional) check with the asker if you understand their question accurately
- ☐ Answer the question
- ☐ Peer check – incorporate recommendations, including whether it should be added to OLPF collection, (assigned by OL program office branch chief)
- ☐ Provide the approved response to the asker and check whether you answered their question

Added to OLPF

- ☐ Rephrase the question for brevity, clarity, and generality
- ☐ (Optional) check with the asker if you understand their question accurately
- ☐ Answer the question
- ☐ Peer check – incorporate recommendations, including whether it should be added to OLPF, (assigned by OL program office branch chief)
- ☐ Make a copy of the OLPF working file to ensure a safe backup file (found in IOLB G drive → OLWEB → OL Feedback²)
- ☐ Add the approved response to the appropriate section of the OLPF working file
- ☐ Wherever OLPF question numbers are used, ensure that they are formatted as a heading, bolded, underlined, and cross-referenced (References tab → cross-reference → select heading reference type → select desired OLPF)
- ☐ Make a brief record of changes entry to the OLPF working file
- ☐ Add the updated OLPF working file to ADAMS for posting to public website (IOLB → OL PUBLIC WEBSITE → OLPF)
- ☐ Once declared, update the [public website](#) to the new OLPF using an email to [NRRWebServices Resource](#)

² Find templates for ADAMS 665 forms and the public website update including recent OLPF working files at this file address: G:\ADRO\DRO\IOLB\OLWEB\OL Feedback