AMERICAN NUCLEAR SOCIETY STANDARDS INQUIRY SUBMITTAL FORM

The American Nuclear Society (ANS) Standards Committee will provide responses to inquiries about requirements, recommendations, and/or permissive statements (i.e., "shall," "should," and "may," respectively) in American National Standards that are developed and approved by ANS. Responses to inquiries will be provided according to the Policy Manual for the ANS Standards Committee. Non relevant inquiries or those concerning unrelated subjects will be returned with appropriate explanation. ANS does not develop case interpretations of requirements in a standard that are applicable to a specific design, operation, facility, or other unique situation only, and therefore is not intended for generic application.

Responses to inquiries on standards are published in the Society's magazine, *Nuclear News*, and are available publicly on the ANS Web site or by contacting the ANS Standards Manager.

The following information must be provided when submitting a standards inquiry. Date Inquiry Submitted to ANS: **INQUIRER** Name: Company or Institutional Affiliation: (if applicable) Title or Position: Address: Telephone: E-mail: THE APPLICABLE STANDARD EDITION, SECTION, PARAGRAPH, FIGURE AND/OR TABLE: **PURPOSE(S) OF THE INQUIRY:**

THE INQUIRY STATED IN A CLEAR, CONCISE MANNER:	
A PROPOSED REPLY, IF THE INQUIRER IS IN A POSITION TO OFFER ONE:	
URGENCY (Check One): ☐ Need within 3 months (minimum time needed for formal response/see attached policy)	
☐ No immediate urgency	
☐ Need by (date):	
Basis for urgency:	

INQUIRIES SHOULD BE ADDRESSED TO:

D STANDARDS PROCESSES

D1 POLICY ON DEVELOPING RESPONSES TO INQUIRIES ABOUT STANDARDS REQUIREMENTS, RECOMMENDATIONS, AND PERMISSIONS

1 BACKGROUND

The Standards Committee shall make timely responses to inquiries about requirements, recommendations and/or permissive statements (i.e., "shall," "should," and "may," respectively) in American National Standards that are developed and approved by ANS. ANS does not develop case interpretations.

2 DEFINITIONS

2.1 Response

A written response to an inquiry about the content of an American National Standard developed by ANS.

2.2 Case Interpretation

A statement concerning a requirement that falls within the scope of the original standard but supplements or modifies (or both) the requirements stated in the standard that is applicable to a specific design, operation, facility, or other unique situation only and is not intended for generic application.

2.3 Inquiry

A question about a specific ANS standard that relates to the generic requirements, recommendations, and/or permissive statement(s) in that standard.

2.4 Not Relevant

An inquiry about an ANS standard for which the standard does not, or should not, address the subject of the inquiry.

3 REQUIREMENTS FOR RESPONDING TO INQUIRIES

3.1 Response

Relative to the inquiry, the consensus response should explain the requirement, recommendation, or permissive statement(s) in the standard and how it is intended to be applied generically (i.e., non-specifically). The response shall not make any statement(s) that would modify (i.e., subtract or add to) a requirement as presented in the text of the standard.

4 PROCEDURE

4.1 Tracking

The Standards Manager shall monitor the evaluation of all inquiries and shall assist the ANS Standards Board Chair in ensuring that the requirements of this policy are properly implemented.

4.2 Distribution and Initial Evaluation

The Standards Manager shall send each inquiry to the ANS Standards Board Chair, the responsible Consensus Committee Chair, and responsible Subcommittee Chair for their review to assure that the inquiry is relevant to the identified standard and does not qualify as a case interpretation. In determining whether the inquiry is a case interpretation, consideration should be given to whether the subject, is generalized, and would provide meaningful and useful information to many of the users of the standard. If this is the case, the inquiry response should indicate that it can only address the generic issue and proceed to do so. If the inquiry is determined to be a case interpretation, not relevant to the specified standard, or that there is no responsible consensus committee to respond to the inquiry, the Standards Board Chair shall provide an explanation of such circumstances to the requestor within 30 days of the receipt of the inquiry. Upon the determination by the Standards Board Chair, Consensus Committee Chair, and Subcommittee Chair that the inquiry is not a case interpretation and is relevant to the referenced standard the Subcommittee Chair shall manage the development of a response to the inquiry according to Article 4.3.

4.3 Development and Approval of an Inquiry Response

The official response to an inquiry about a specifically dated standard shall be developed through the same consensus process as used for the development of the referenced specific standard. The only exception from that process is that voting periods for the development of the response should be less than the maximum voting periods permitted for developing and approving American National Standards Institute/ANS standards. A ballot period of two weeks is recommended for committee approval of inquiry responses. A draft response should be developed for ballot within three months of inquiry receipt by ANS. Depending upon the availability of working group members, the following inquiry response development alternatives shall be considered in the following order of preference.

4.3.1 First Alternative

If a sufficient number of working group members who authored the specifically dated standard are available and can be reconstituted, then the Subcommittee Chair shall request that those working group members draft the response to the inquiry. The response shall meet the approval of the majority number of those participating working group members who authored the specifically dated standard. Following the response approval by that majority, the draft response shall proceed through the same ANS standards consensus balloting process used for issuing ANS standards. If the response cannot meet the approval of that working group majority, then the development of the response shall be in accordance with Article 4.3.2.

4.3.2 <u>Second Alternative</u>

Failing the First Alternative, the Subcommittee Chair shall request that the present working group responsible for maintaining or revising the specifically dated or titled standard draft the

response to the inquiry. Final approval of the inquiry response shall be in accordance with the same ANS standards consensus balloting process used for issuing ANS standards. If there is no working group maintaining the specifically dated or titled standard then the development of the response shall be in accordance with Article 4.3.3.

4.3.3 Third Alternative

Failing the first and second alternatives, the Consensus Committee Chair or Subcommittee Chair shall request that the responsible subcommittee draft the response to the inquiry or create an ad-hoc working group of persons knowledgeable in the area of the inquiry to draft the response. Final approval of the inquiry response shall be in accordance with the same ANS standards consensus balloting process used for issuing ANS standards.

In the event that knowledgeable resources cannot be obtained, or are unable to draft a consensus response, the responsible Consensus Committee Chair shall provide a statement to that effect to the Standards Board Chair for transmittal to the requestor.

4.4 Response to Requestor

As soon as the Consensus Committee Chair and the Subcommittee Chair have reached an agreement on the appropriate response, the Consensus Committee Chair should contact the requestor with the appropriate answer pending possible minor changes as the response completes the consensus approval process for the sole purpose of asking the inquirer: "Does this draft response answer your question?" After all consensus approvals have been obtained, the Standards Board Chair shall send the response to the requestor and to the Standards Manager. The response shall be sent to the requestor within six months after receipt of the request by the ANS Standards Manager unless an alternate schedule is developed and understood by the requestor within three months of receipt.

4.5 Publication

Approved inquiry responses shall be published in *Nuclear News* and *Nuclear Standards News* within two months after the reply was sent to the requestor.