

**U.S. Nuclear Regulatory Commission
Advisory Committee on the Medical Use of Isotopes**

ACMUI Institutional Memory Subcommittee

Draft Report

Submitted on: August 8, 2019

Subcommittee membership:

Dr. Ronald Ennis, Dr. Michael O'Hara, Dr. A. Robert Schleipman (chair), Ms. Megan Shober, and Ms. Laura Weil

The NRC staff resource is Ms. Kellee Jamerson.

Introduction:

At the April 3-4, 2019 meeting, ACMUI members discussed difficulties in readily recalling or accessing past ACMUI deliberations and discussions. While the Office of Nuclear Materials Safety and Safeguards (NMSS) staff members often “fill in the gaps”; their rotating assignments, and ACMUI turnover, may further contribute to a loss of continuity and institutional memory. This subcommittee was formed at that meeting.

The verbatim charge is: “to improve the ACMUI’s institutional memory and provide possible recommendations for methods of tracking and/or retrieving ACMUI documents”.

Background:

Open public meetings are held by the Nuclear Regulatory Commission (NRC) as required by the Government in the Sunshine Act.¹ Furthermore, as a Federal Advisory Committee, the ACMUI holds a number of open sessions which are transcribed and documented for member and public review.² While these transcripts clearly reflect the comments and proposals of the open session; they do not capture all decision-making comments and rationales discussed by ACMUI members and NRC staff. For example, the ACMUI RECOMMENDATIONS AND ACTION ITEMS list discussed at the April 2019 meeting presents pending and open action items extending back to 2007, without clear documentation of why certain items remain open. Present NMSS staff members were able to clarify many of these standing or unresolved items.

Of note, NMSS staff have recently enhanced the ACMUI website, which provides a considerable amount of pertinent information.³ In addition to the ACMUI site, the agency (NRC) website

¹ Pub. L. No. 94-409, 90 Stat. 1241 (1976) (5 U.S.C. §552b)

² 41 C.F.R. § 102–3.

³ U.S. Nuclear Regulatory Commission. *Advisory Committee on the Medical Uses of Isotopes*. April 2, 2019. Retrieved from: <https://www.nrc.gov/about-nrc/regulatory/advisory/acmui.html>

provides links to regulatory processes, sections on rulemaking and procedures, authorizing and governing legislation, the NMSS section, and an NRC Ethics section with links to the Office of Government Ethics.⁴

Current resources

ACMUI/NRC website

The aforementioned ACMUI website, last reviewed on 18 July 2019 provides the following:

- ACMUI Charter (as of 10 March 2016)
- ACMUI Bylaws (as of 10 July 2019)
- A brief ACMUI History page with historical membership list (1988-2017; acknowledged as incomplete)
- ACMUI current membership page
- ACMUI Meetings and Related Documents page includes agendas, meeting handouts, slides, summary reports, open meeting transcripts
- ACMUI Recommendations and Actions (items, dates, status, in pdf format), 2007-2018
- ACMUI Subcommittee reports page (2002-2019) Last Reviewed/Updated 28 May 2019
- ACMUI Subcommittees file (name, charge, members – including NRC staff resource, status) spanning 30 Jan 2014 – 25 March 2019

These last two items provide considerable documentation, and a record of varied subcommittees' make-up, dates of formation and deactivation, and their actual output, whether as draft or final reports. This provides much of the institutional memory in an accessible format for members, as well as, in keeping with Open Government ideals, the public.

Website update frequency

Ms. Jamerson and Ms. Holiday noted that the website updates commenced before 2010 and are posted by the ACMUI Coordinator. Posting frequency varies and is generally subject to availability of resources and documents received from the ACMUI. For example, documents from the April 2019 meeting were posted around 2 weeks prior to the meeting – as that was the timeframe in which they were submitted by presenters. Final Subcommittee Reports are posted after a report is received.

Website functionality

Subcommittee members pointed out that a search function would greatly facilitate navigating to the desired documents. As an example, entering "AU" could link to reports featuring Authorized User content. Of course, this would depend on the quality of the search engine and database. There are varied options available to add this type of functionality to existing, static websites.

The current NRC website does provide a Search box (designated as "Google Custom Search") directly linked to, and available from, the ACMUI website page. However, the search box entry does not easily discriminate all acronyms. For example, an entry of "AO" yields "annotated

⁴ U.S. Nuclear Regulatory Commission. Retrieved from: <https://www.nrc.gov>

outline” documents, as well as “abnormal occurrence” documents for reactor issues in addition to medical use reports. Furthermore, the search box function generates a search of all retrievable NRC documents, so that “AO” also yields Commission reports to Congress. Empiric testing with more granular entries, e.g., “Abnormal Occurrence, ACMUI” yielded specific and relevant documents (draft and final ACMUI reports, corresponding SECY papers, etc.). Adding “_, ACMUI” to search categories, e.g., “90Y, ACMUI”, appears to delimit the search to ACMUI documents related to 90-Yttrium.

New Member Orientation

The NRC website includes a New Employees portal that does not quite apply to ACMUI members; though it does include “*Major Ethics Rules Affecting NRC Special Government Employees*” document, which does apply. The ACMUI website Membership page provides a link to NUREG/BR-0309, “*Serving on the Advisory Committee on the Medical Uses of Isotopes (ACMUI): A Member’s Guide*.”⁵ The guide provides an overview of ACMUI functions, purpose, and interactions with the Commission. It was last updated in 2004.

Subcommittee members suggested a less formal, ACMUI-specific onboarding guide. This might contain a glossary for perennial topics and perhaps a “current events” backgrounder. If deemed helpful, subcommittee members are willing to draft this with staff assistance.

Alternative Options

Practice-based changes

Subcommittee members suggested and endorsed a practice-based addition to current ACMUI subcommittee reporting. Essentially, each new subcommittee would be tasked to review available materials regarding previous ACMUI deliberations relating to the subcommittee’s charge. This could be succinctly summarized in a few paragraphs with deliberate references to past ACMUI/NRC documents so that members could more easily trace relevant historical documents.

Miscellany

A tangentially related issue is the availability of ACMUI/NRC documents from sources other than the GPO, ADAMS, or the Commission’s website. NMSS staff were asked if a SharePoint, enterprise Dropbox, LAN (local area network,) or other shared files application were used by NRC; and perhaps available to ACMUI members for tracking subcommittee reports as they evolve. The response was that ACMUI members do not have access to the LAN (local area network). The rationale for this is that having access to the LAN would subject the ACMUI to much more annual training requirements, as well as the NRC’s ability to monitor members’ computers. This has been the biggest point of contention and basis for why the ACMUI has

⁵ U.S. Nuclear Regulatory Commission, Office of Nuclear Material Safety and Safeguards *NUREG/BR-0309. Serving on the Advisory Committee on the Medical Uses of Isotopes (ACMUI): A Member’s Guide* March 2004. Washington, DC.

been content to not push for this access and its related security requirements. Ms. Holiday noted that in the future there may be additional options (and related training) for ACMUI members to copy files to a shared digital space, enhancing FACA recordkeeping.

Summary

ACMUI institutional memory is, in part, diminished by the necessary turnover of ACMUI members, and the transfers and occasional reassignments of NMSS staff. A review of current resources identifies ACMUI-focused searches of the NRC website as a robust and accessible source of ACMUI documents. The ACMUI webpage also provides archived reports in systematic fashion.

Recommendations

The Subcommittee identified two recommendations that would potentially enhance ACMUI institutional memory:

1. The Subcommittee recommends enhancing the onboarding process for new ACMUI members with an updated new member guide (NUREG/BR-0309), and possibly an ACMUI generated background/perennial topics sheet.
2. The Subcommittee recommends enhancing ACMUI Subcommittee reports by augmenting each report with a brief summary of previous ACMUI deliberations on the topic, and specifically referencing related ACMUI/NRC documents so that members can more easily trace relevant historical discussions. This will provide continuity and a reference point for new deliberations, preserving some aspects of institutional memory.

Respectfully submitted,
ACMUI Institutional Memory Subcommittee
A. Robert Schleipman, Chair
August 8, 2019