

STATE OF ILLINOIS  
**DEPARTMENT OF NUCLEAR SAFETY**

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March 28, 2000

Paul H. Lohaus, Director  
Office of State Programs  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: Comments on Draft OSP Procedure SA-100, "Implementation of the Integrated Materials Performance Evaluation Program (IMPEP)" (SP-00-008)

Dear Mr. Lohaus:

The Illinois Department of Nuclear Safety hereby submits comments on the State Program Procedure identified above. This document describes the procedures for conducting IMPEP reviews including scheduling, assigning personnel and reporting the results of reviews of NRC and Agreement State programs. The procedure appears to be biased towards NRC audits of the States. Additional requirements should be included for audits of NRC Headquarters and the Regions. Our comments are as follows:

1. This document does not appear to include provisions for audits of NRC Headquarters such as the sealed source and device reviews. As the Department understands it, these are to be routine audits conducted under IMPEP. Please include these in the SA-100 procedure.
2. In Section IV(I), page 4, please include additional duties of IMPEP team members such as interviews with appropriate staff and inspection accompaniments.
3. In Section V(C)(2), page 7, if this is truly to be a process involving a partnership in the audit of regulatory programs, the option of including additional Agreement State personnel on review teams should be provided, particularly for sealed source and device reviews of NRC.

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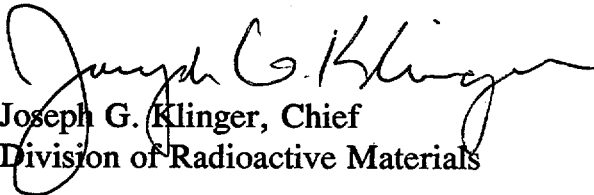
4. Section V(D), page 8, should prompt team leaders to schedule the tentative dates for the Management Review Board meeting at the same time they schedule the program review. This change should be reflected in OSP Procedure SA-106 as well.
5. In Section V(E), page 9, please indicate what steps are taken if the NRC or Agreement State fails to adequately address items in the questionnaire. In some cases, these deficiencies will need to be resolved prior to the actual audit so that team members can prepare adequately. If only minor deficiencies are present, these can be addressed during the audit itself.
6. Items g. and h. in Section V(F), page 11, appear to apply to NRC Headquarters and Regions as well as the States. Please include these as items to be reviewed for NRC offices.
7. In V(G)(6), page 12, the team leader should also include a discussion of significant changes/innovations that the Agreement State under review is using. NRC program changes are not always more significant than those in the Agreement State.
8. The sample correspondence listed in the appendices is for NRC audits of Agreement States. Applicable correspondence should be included for use in reviews of the Regions and NRC Headquarters.
9. Throughout the document and on page 23, references have been made to a number of Management Directives and OSP Procedures. If this document is to be used by IMPEP team members to prepare for reviews, the revision number or date these documents became final should be included. Management Directive 5.6 has been revised at least once since its inception.
10. Spacing of the document should be corrected in Sections IV(H), V(J)(5) and V(K)(2).

Paul H. Lohaus, Deputy Director OSP  
March 8, 2000

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Thank you for the opportunity to comment on this draft procedure. Should you have any questions, please contact me or Gibb Vinson at (217) 785-9947.

Sincerely,



Joseph G. Klinger, Chief  
Division of Radioactive Materials

JGK:CGV:kjg

cc: James Lynch, NRC Region III  
Kathy Schneider, Office of State Programs