

May 3, 2000

ALL AGREEMENT STATES  
MINNESOTA, OKLAHOMA, PENNSYLVANIA, WISCONSIN

PROGRAM MANAGEMENT INFORMATION: IDENTIFICATION OF GOOD PRACTICES  
IN 1999 INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM REVIEWS  
AND GENERAL RECOMMENDATIONS (STP-00-039)

Enclosed are two reports prepared by the Nuclear Regulatory Commission (NRC) staff. The first report (Enclosure 1) is on good practices which were identified during the Integrated Materials Performance Evaluation Program (IMPEP) reviews from 1999 in Utah, Florida, Maryland, North Dakota, New York City Department of Health, Kansas, South Carolina, Iowa, Washington, California, NRC Sealed Source and Device Program, and NRC Regions III and IV. NRC staff is making this information available to both NRC Regions and the Agreement States to identify and share innovative and effective practices used to implement the materials licensing and inspection programs throughout the nation. You may find some techniques used elsewhere that can be incorporated to enhance some aspect(s) of your own programs. We plan to continue to identify good practices through IMPEP reviews and to issue similar reports periodically.

The second report (Enclosure 2) summarizes in a general manner, recommendations identified in more than one IMPEP review during 1999. This information is being provided for your use in identifying areas in the Atomic Energy Act materials programs that may need strengthening.

If you have any questions regarding this correspondence, please contact me or the individual named below.

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INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM (IMPEP)  
GOOD PRACTICES IDENTIFIED DURING  
JANUARY-DECEMBER 1999 REVIEWS

## INTRODUCTION

The Integrated Materials Performance Evaluation Program (IMPEP) is used by the Nuclear Regulatory Commission (NRC) to review Agreement State and NRC Regional materials regulatory programs. It provides a uniform approach for review of such programs and is based on five performance indicators that are common to Agreement State and Regional materials radiation control programs. The basic concept in IMPEP is that use of common performance indicators will allow NRC to conduct consistent reviews of Regional and Agreement State materials programs that focus on performance. These indicators are as follows:

- Status of Materials Inspections Program
- Technical Quality of Inspections
- Technical Staffing and Training
- Technical Quality of Licensing Actions
- Response to Incidents and Allegations

Certain non-reactor functions that continue to be conducted from NRC Headquarters, such as fuel cycle licensing, uranium and thorium milling licensing, sealed source and device reviews, and low-level radioactive waste disposal licensing, are excluded from the set of common indicators because they are not common to Regional and Agreement State activities. These are incorporated, as appropriate, as non-common indicators contributing to a performance-based evaluation of the program. For Agreement States, the non-common indicators are legislation and program elements required for compatibility, sealed source and device (SS&D) evaluation program, low-level radioactive waste disposal program and uranium recovery program.

## PURPOSE

This report provides a summary of good practices identified during IMPEP reviews of two NRC Regional offices, one NRC Headquarters' program and ten Agreement States conducted from January to December 1999. This summary is being shared with Regional and Agreement State program managers throughout the nation for your consideration as to whether your programs might be enhanced by adopting the good practices of other regulators. The previous good practice reports are contained in the All Agreement States letter SP-97-081, dated November 21, 1997 and SP-99-011, dated February 22, 1999 on the same subject (located on the STP Home Page at <http://www.hsr.d.ornl.gov/nrc/agstates/program/SP97081.pdf> and <http://www.hsr.d.ornl.gov/nrc/agstates/program/SP99011.pdf> ).

ENCLOSURE 1

## STATUS OF MATERIALS INSPECTION PROGRAM

The Washington program has a policy of hand-delivering initial licenses which gives their staff an opportunity to discuss the ramifications of the license with the new licensee. Initial inspections were performed within six months of license delivery or material receipt, in accordance with IMC 2800 requirements. Additionally, follow-up inspections were performed one year from the date of each initial inspection.

**Washington contact:** **John Erickson**  
**Telephone:** **360-236-3210**

California undertook a process for evaluating, analyzing and supporting a change in the inspection frequency (extending the inspection period) for a class of licensees (high dose rate afterloaders) based on performance.

**California contact:** **Edgar Bailey**  
**Telephone:** **916-322-3482**

## TECHNICAL QUALITY OF INSPECTIONS

The Utah program utilizes an inspection compliance history form both for the materials program and the low-level radioactive waste disposal program. The compliance history form includes all of the past inspection findings for the facility and is used not only to help the inspector prepare for the inspection, but also as a teaching tool during the inspection to help the licensee better understand the issues and past history of the license.

**Utah contact:** **William Sinclair**  
**Telephone:** **801-5364255**

## TECHNICAL STAFFING AND TRAINING

The Florida staff assembled and presented a basic health physics training module that included the use of video recording the instructor practice sessions, for self-critique and improvement on the course presentation.

**Florida contact:** **William Passetti**  
**Telephone:** **850-487-1004**

## TECHNICAL QUALITY OF LICENSING ACTIONS

The South Carolina program hand delivers all new licenses.

**South Carolina contact:** **Pearce O'Kelley**  
**Telephone:** **803-737-7403**

## RESPONSE TO INCIDENTS AND ALLEGATIONS

The California program utilizes a Quality Assurance Health Physicist and has found it helpful for a large radiation control program. The position strengthens the California's performance and ensures that health and safety issues are properly addressed.

**California contact:** **Edgar Bailey**  
**Telephone:** **916-322-3482**

## SEALED SOURCE AND DEVICE PROGRAM

The NRC SS&D evaluation program instituted a screening process for all SS&D applications in 1999. The NRC has found that an initial screening of an application saves time and effort. An application is initially reviewed to determine if it will have enough information to perform the review. If incomplete, or if information is lacking, the application is returned to the applicant without further review.

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**Telephone:** **301-415-7231**

## LEGISLATION AND PROGRAM ELEMENTS REQUIRED FOR COMPATIBILITY

The California program reviews draft regulations by reading out loud the regulations to available staff. This practice provides the technical and administrative staffs, the individuals responsible for implementing the regulations and those most often in contact with the licensees, the opportunity to identify potential problems before the regulations are finalized.

**California contact:** **Edgar Bailey**  
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The IMPEP review teams plan on identifying good practices during future reviews and we plan to continue to prepare and distribute summaries of good practices that have been identified to both Regions and Agreement States.

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RECOMMENDATIONS IDENTIFIED IN  
MORE THAN ONE REVIEW COMPLETED  
FROM  
JANUARY - DECEMBER 1999  
UNDER THE  
INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM

## INTRODUCTION

The Integrated Materials Performance Evaluation Program (IMPEP) is the Nuclear Regulatory Commission's (NRC's) approach to review Agreement State and NRC Regional materials radiation control programs. This report provides a summary of recommendations identified in more than one IMPEP review completed in 1999 of two Regional offices, one Headquarters' function and ten Agreement States. This summary is being shared with Regional and Agreement State program managers for your consideration as to whether these weakness may be present in your programs. Reports of the completed IMPEP reviews completed during 1999 for the Agreement States can be located on the Office of State and Tribal Programs (STP) Home Page (<http://www.hsr.d.ornl.gov/nrc/>). Both the Regional and Agreement State reviews are available through the NRC public document room. Note, those recommendations marked with an "\*" are repeat recommendations from the All Agreement States letter SP-97-081, dated November 21, 1997 on the same subject (located on the STP Home Page at <http://www.hsr.d.ornl.gov/nrc/agstates/program/SP97081.pdf>).

## STATUS OF MATERIALS INSPECTIONS

Recommendations to conduct reciprocity inspections according to the provisions of NRC Inspection Manual Chapter 1220 were made.\*

## TECHNICAL STAFFING AND TRAINING

Recommendations were made to several States to evaluate staffing needs, both present and future to ensure budgeted staffing levels were adequate for the responsibilities of the State.

Recommendations were made to provide specialized training or equivalent in such areas as brachytherapy, teletherapy, and irradiator technology for the staff responsible for licensing and inspection for these categories of licensees. (Note, no performance issues were identified).

## RESPONSE TO INCIDENTS AND ALLEGATIONS

Recommendations were made to several States that they use OSP Procedure SA-300 "Reporting Material Events" for review and reporting of material events to NRC.\*

Recommendations were made to revise allegation procedures.

## SEALED SOURCE AND DEVICE (SS&D) EVALUATION PROGRAM

Recommendations were made to develop a written formal SS&D training and qualifications program including minimum qualifications for signature authority.\*