

June 21, 2000

ALL AGREEMENT STATES  
MINNESOTA, OKLAHOMA, PENNSYLVANIA, WISCONSIN

**OTHER INFORMATION: REVIEW OF IMPEP QUESTIONNAIRE FOR OMB CLEARANCE  
(STP-00-052)**

Enclosed for your review and comment is a redline/strikeout copy of the Integrated Materials Performance Evaluation Program (IMPEP) questionnaire. The questionnaire will be undergoing clearance by the Office of Management and Budget (OMB) in the Fall of 2000, and any comments or suggestions you may have to improve the questionnaire's effectiveness would be appreciated.

Note, the Nuclear Regulatory Commission (NRC) staff has proposed that on page 4 of the questionnaire, under Section A. V, "Response to Incidents and Allegations," questions 23 and 24a, which state:

- 23. In the period covered by this review, were there any cases involving possible wrongdoing that were reviewed or are presently undergoing review? If so, please describe the circumstances for each case;
- 24a. For Agreement States, please identify allegations referred to your program by the NRC that have not been closed;

be removed from the listing of questions requiring a written response from the State. Allegation information is to be kept protected and not released in a public document such as the questionnaire, therefore the staff proposes to discuss the information purported by questions 23 and 24a at the onsite portion of the IMPEP review. This proposed change has been included in this All Agreement States letter for your consideration and example.

Please review the questionnaire and direct any comments you may have within 45 days of receipt of this letter to:

POINT OF CONTACT: Kathleen Schneider INTERNET: [kxs@nrc.gov](mailto:kxs@nrc.gov)  
TELEPHONE: 301-415-2320 FAX: 301-415-3502

This information request has been approved by OMB 3150-0029, expiration 04/30/01. The estimated burden per response to comply with this voluntary collection request in 6 hour(s). Forward any comments regarding the burden estimate to the Information and Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0029), Office of Management and Budget, Washington, DC 2053. If a document does not display a current valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information.

**/RA/**

Frederick C. Combs, Deputy Director  
Office of State and Tribal Programs

Enclosure:  
As stated

STP-00-052

Distribution:

DIR RF  
SDroggitis  
Agreement State File

DCD (SP03) PDR (YES✓)

**DOCUMENT NAME: G:\IMPEP\STP-00-052**

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OFFICE	STP	STP	STP:DD				
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DATE	06/12/2000	06/20/2000	06/21/2000				

STP-A-4

INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM

QUESTIONNAIRE

Name of State/Regional Program

Reporting Period: Month XX, [YEAR], to Month XX, [YEAR]

**A. COMMON PERFORMANCE INDICATORS**

I. Status of Materials Inspection Program

1. Please prepare a table identifying the licenses with inspections that are overdue by more than 25% of the scheduled frequency set out in NRC Inspection Manual Chapter 2800. The list should include initial inspections that are overdue.

<u>Licensee Name</u>	<u>Insp. Frequency (Years)</u>	<u>Due Date</u>	<u>Months O/D</u>
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2. Do you currently have an action plan for completing overdue inspections? If so, please describe the plan or provide a written copy with your response to this questionnaire.
3. Please identify individual licensees or groups of licensees the State/Region is inspecting more or less frequently than called for in NRC Inspection Manual Chapter 2800 and state the reason for the change.

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<sup>1</sup> Estimated burden per response to comply with this voluntary collection request: 45 hours. Forward comments regarding burden estimate to the Information and Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0183), Office of Management and Budget, Washington, DC 20503. If an information collection does not display a currently valid OMB control number, NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

4. Please complete the following table for licensees granted reciprocity during the reporting period.

Priority	Number of Licensees Granted Reciprocity Permits Each Year	Number of Licensees Inspected Each Year
Service Licensees performing teletherapy and irradiator source installations or changes	YR YR YR YR	YR YR YR YR
1	YR YR YR YR	YR YR YR YR
2	YR YR YR YR	YR YR YR YR
3	YR YR YR YR	YR YR YR YR
4		
All Other		

5. Other than reciprocity licensees, how many field inspections of radiographers were performed?
6. For NRC Regions, did you establish numerical goals for the number of inspections to be performed during this review period? If so, please describe your goals, the number of inspections actually performed, and the reasons for any differences between the goals and the actual number of inspections performed.

II. Technical Quality of Inspections

7. What, if any, changes were made to your written inspection procedures during the reporting period?
8. Prepare a table showing the number and types of supervisory accompaniments made during the review period. Include:

Inspector                      Supervisor                      License Cat.                      Date

9. Describe internal procedures for conducting supervisory accompaniments of inspectors in the field. If supervisory accompaniments were documented, please provide copies of the documentation for each accompaniment.
10. Describe or provide an update on your instrumentation and methods of calibration. Are all instruments properly calibrated at the present time?

III. Technical Staffing and Training

11. Please provide a staffing plan, or complete a listing using the suggested format below, of the professional (technical) person-years of effort applied to the agreement or radioactive material program by individual. Include the name, position, and, for Agreement States, the fraction of time spent in the following areas: administration, materials licensing & compliance, emergency response, LLW, U-mills, other. If these regulatory responsibilities are divided between offices, the table should be consolidated to include all personnel contributing to the radioactive materials program. Include all vacancies and identify all senior personnel assigned to monitor work of junior personnel. If consultants were used to carry out the program's radioactive materials responsibilities, include their efforts. The table heading should be:

<u>Name</u>	<u>Position</u>	<u>Area of Effort</u>	<u>FTE%</u>
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12. Please provide a listing of all new professional personnel hired since the last review, indicate the degree(s) they received, if applicable, and additional training and years of experience in health physics, or other disciplines, if appropriate.
13. Please list all professional staff who have not yet met the qualification requirements of license reviewer/materials inspection staff (for NRC, Inspection Manual Chapters 1246; for Agreement States, please describe your qualifications requirements for materials license reviewers and inspectors). For each, list the courses or equivalent training/experience they need to attend and a tentative schedule for completion of these requirements.
14. Please identify the technical staff who left the RCP/Regional DNMS program during this period.
15. List the vacant positions in each program, the length of time each position has been vacant, and a brief summary of efforts to fill the vacancy.

IV. Technical Quality of Licensing Actions

16. Please identify any major, unusual, or complex licenses which were issued, received a major amendment, were terminated, decommissioned, submitted a bankruptcy notification or renewed in this period. Also identify any new or amended licenses that now require emergency plans.

17. Discuss any variances in licensing policies and procedures or exemptions from the regulations granted during the review period.
18. What, if any, changes were made in your written licensing procedures (new procedures, updates, policy memoranda, etc.) during the reporting period?
19. For NRC Regions, identify by licensee name, license number and type, any renewal applications that have been pending for one year or more.

V. Responses to Incidents and Allegations

20. Please provide a list of the reportable incidents (i.e., medical misadministration, overexposures, lost and abandoned sources, incidents requiring 24 hour or less notification, etc. See Handbook on Nuclear Material Event Reporting in Agreement States for additional guidance.) that occurred in the Region/State during the review period. For Agreement States, information included in previous submittals to NRC need not be repeated (i.e., those submitted under OMB clearance number 3150-0178, Nuclear Material Events Database). The list should be in the following format:

<u>Licensee Name</u>	<u>License #</u>	<u>Date of Incident/Report</u>	<u>Type of Incident</u>
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21. During this review period, did any incidents occur that involved equipment or source failure or approved operating procedures that were deficient? If so, how and when were other State/NRC licensees who might be affected notified? For States, was timely notification made to NRC? For Regions, was an appropriate and timely PN generated?
22. For incidents involving failure of equipment or sources, was information on the incident provided to the agency responsible for evaluation of the device for an assessment of possible generic design deficiency? Please provide details for each case.
- ~~23. In the period covered by this review, were there any cases involving possible wrongdoing that were reviewed or are presently undergoing review? If so, please describe the circumstances for each case.~~
234. Identify any changes to your procedures for handling allegations that occurred during the period of this review.
  - a. ~~For Agreement States, please identify any allegations referred to your program by the NRC that have not been closed.~~

VI. General

245. Please prepare a summary of the status of the State's or Region's actions taken in response to the comments and recommendations following the last review.
256. Provide a brief description of your program's strengths and weaknesses. These strengths and weaknesses should be supported by examples of successes, problems or difficulties which occurred during this review period.

## B. NON-COMMON PERFORMANCE INDICATORS

### I. Legislation and Program Elements Required for Compatibility

267. Please list all currently effective legislation that affects the radiation control program (RCP).
278. Are your regulations subject to a "Sunset" or equivalent law? If so, explain and include the next expiration date for your regulations.
289. Please complete the enclosed table based on NRC chronology of amendments. Identify those that have not been adopted by the State, explain why they were not adopted, and discuss any actions being taken to adopt them. Identify the regulations that the State has adopted through legally binding requirements other than regulations.
2930. If you have not adopted all amendments within three years from the date of NRC rule promulgation, briefly describe your State's procedures for amending regulations in order to maintain compatibility with the NRC, showing the normal length of time anticipated to complete each step.

### II. Sealed Source and Device Program

304. Prepare a table listing new and revised SS&D registrations of sealed sources and devices issued during the review period. The table heading should be:

<u>SS&amp;D Registry Number</u>	<u>Manufacturer, Distributor or Custom User</u>	<u>Type of Device or Source</u>	<u>Date Issued</u>
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312. What guides, standards and procedures are used to evaluate registry applications?
323. Please include information on the following questions in Section A, as they apply to the Sealed Source and Device Program:

Technical Staffing and Training - A.III.11-15  
Technical Quality of Licensing Actions - A.IV.16-18  
Responses to Incidents and Allegations - A.V.20-23

III. Low-Level Waste Program

334. Please include information on the following questions in Section A, as they apply to the Low-level Waste Program:

Status of Materials Inspection Program - A.I.1-3, A.I.6

Technical Quality of Inspections - A.II.7-10

Technical Staffing and Training - A.III.11-15

Technical Quality of Licensing Actions - A.IV.16-18

Responses to Incidents and Allegations - A.V.20-23

IV. Uranium Mill Program

345. Please include information on the following questions in Section A, as they apply to the Uranium Mill Program:

Status of Materials Inspection Program - A.I.1-3, A.I.6

Technical Quality of Inspections - A.II.7-10

Technical Staffing and Training - A.III.11-15

Technical Quality of Licensing Actions - A.IV.16-18

Responses to Incidents and Allegations - A.V.20-23

TABLE FOR QUESTION 29.

10 CFR RULE	DATE DUE	DATE ADOPTED	OR	
			CURRENT STATUS	EXPECTED ADOPTION
Any amendment due prior to 1993. Identify each regulation (refer to the Chronology of Amendments)				
Emergency Planning; Parts 30, 40, 70	4/7/93			
Standards for Protection Against Radiation; Part 20	1/1/94			
Safety Requirements for Radiographic Equipment; Part 34	1/10/94			
Notification of Incidents; Parts 20, 30, 31, 34, 39, 40, 70	10/15/94			
Quality Management Program and Misadministrations; Part 35	1/27/95			
Licensing and Radiation Safety Requirements for Irradiators; Part 36	7/1/96			
Definition of Land Disposal and Waste Site QA Program; Part 61	7/22/96			
Decommissioning Recordkeeping: Documentation Additions; Parts 30, 40, 70	10/25/96			
Uranium Mill Tailings: Conforming to EPA Standards; Part 40	7/1/97			
Timeliness in Decommissioning Parts 30, 40, 70	8/15/97			
Preparation, Transfer for Commercial Distribution, and Use of Byproduct Material for Medical Use; Parts 30, 32, 35	1/1/98			
Frequency of Medical Examinations for Use of Respiratory Protection Equipment	3/13/98			

10 CFR RULE	DATE DUE	DATE ADOPTED	OR	
			CURRENT STATUS	EXPECTED ADOPTION
Low-Level Waste Shipment Manifest Information and Reporting	3/1/98			
Performance Requirements for Radiography Equipment	6/30/98			
Radiation Protection Requirements: Amended Definitions and Criteria	8/14/98			
Medical Administration of Radiation and Radioactive Materials.	10/20/98			
Clarification of Decommissioning Funding Requirements	11/24/98			
10 CFR Part 71: Compatibility with the International Atomic Energy Agency	4/1/99			
Termination or Transfer of Licensed Activities: Recordkeeping Requirements.	6/16/99			
Resolution of Dual Regulation of Airborne Effluents of Radioactive Materials; Clean Air Act	1/9/2000			
Recognition of Agreement State Licenses in Areas Under Exclusive Federal Jurisdiction Within an Agreement State	2/27/2000			
Criteria for the Release of Individuals Administered Radioactive Material	5/29/2000			
Licenses for Industrial Radiography and Radiation Safety Requirements for Industrial Radiography Operations; Final Rule	6/27/2000			
Radiological Criteria for License Termination	8/20/2000			
Exempt Distribution of a Radioactive Drug Containing One Microcurie of Carbon-14 Urea	1/2/2001			
Deliberate Misconduct by Unlicensed Persons	2/12/2001			

10 CFR RULE	DATE DUE	DATE ADOPTED	OR	
			CURRENT STATUS	EXPECTED ADOPTION
Licenses for Industrial Radiography and Radiation Safety Requirements for Industrial Radiographic Operations; Clarifying Amendments and Corrections	7/9/2001			
Minor Corrections, Clarifying Changes, and a Minor Policy Change	10/26/2001			
Transfer for Disposal and Manifest; Minor Technical Conforming Amendments	11/20/2001			
Radiological Criteria for License Termination of Uranium Recovery Facilities	6/11/2001			
Respiratory Protection and Controls to Restrict Internal Exposures	2/2/2003			
Energy Compensation Sources for Well Logging and Other Regulation Clarifications	5/17/2003			

## MATERIALS REQUESTED TO BE AVAILABLE FOR THE ONSITE PORTION OF AN IMPEP REVIEW

### ORGANIZATION CHARTS

Clean, sized 8½ X 11" including names and positions

- One showing positions from Governor down to Radiation Control Program Director (RCPD)
- One showing positions of current radiation control program with RCPD as Head
- Equivalent charts for LLRW and mills programs, if applicable

### LICENSE LISTS

- Printouts of current licenses, showing total, as follows:

Name	License #	Location	License Type	Priority	Last Inspection	Due Date
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Sort alphabetically

Also, sort by due date and by priority (if possible)

### THE FOLLOWING LISTS

- List of open license cases, with date of original request, and dates of follow up actions
- List of licenses terminated during review period
- Copy of current log or other document used to track licensing actions
- Copy of current log or other document used to track inspections
- List of Inspection frequency by license type
- ~~Listing or log~~ of all incidents and allegations occurring during the review period. Show whether incident is open or closed and whether it was reported to the NRC.
- List of all allegations occurring during the review period. Show whether allegation is open or closed and whether it was referred by NRC.
- List of all wrongdoings occurring during the review period. Show whether wrongdoing is open or closed.

### THE FOLLOWING DOCUMENTS

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li><input type="checkbox"/> All State regulations</li> <li><input type="checkbox"/> Statutes affecting the regulatory authority of the state program</li> <li><input type="checkbox"/> Standard license conditions</li> <li><input type="checkbox"/> Technical procedures for licensing, model licenses, review guides</li> <li><input type="checkbox"/> SS&amp;D review procedures</li> <li><input type="checkbox"/> Instrument calibration records</li> <li><input type="checkbox"/> Inspection procedures and guides</li> <li><input type="checkbox"/> Inspection report forms</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Records of results of supervisory accompaniments of inspectors</li> <li><input type="checkbox"/> Emergency plan and communications list</li> <li><input type="checkbox"/> Procedures for investigating allegations</li> <li><input type="checkbox"/> Enforcement procedures, including procedures for escalated enforcement, severity levels, civil penalties (as applicable)</li> <li><input type="checkbox"/> Copies of job descriptions</li> </ul> |
|--|---|