

DEPARTMENT OF NUCLEAR SAFETY

1035 OUTER PARK DRIVE • SPRINGFIELD, ILLINOIS 62704
217-785-9900 • 217-782-6133 (TDD)

George H. Ryan
Governor

Thomas W. Ortziger
Director



August 23, 2000

Mr. Paul Lohaus, Director
Office of State Programs
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

00 AUG 28 PM 4:45

DSP

Re: All Agreement States Letter Dated August 2, 2000—Draft Schedule For Fiscal Year 2001 Integrated Materials Performance Evaluation Program (IMPEP) Reviews (STP-00-066)

Dear Mr. Lohaus:

The Illinois Department of Nuclear Safety (Department) hereby submits its comments on the above referenced draft IMPEP schedule. The draft document schedules an IMPEP Review for the Department in November 2000! The Department vehemently objects to such a proposal and strongly advises the NRC to revise the draft document to indicate an IMPEP review no sooner than March 2001.

The Department participated in an IMPEP review on March 24-28, 1997, and our radiation control program was found to be adequate to protect public health and safety and compatible with NRC's program in a final report dated July 8, 1997. Since the last review, we have been consistently informed that our next review would be in "four years." We note that on page 1 of your latest version of Management Directive 5.6, Integrated Materials Performance Evaluation Program (IMPEP) handbook states, "Under normal conditions, this would allow evaluations of NRC regions every 2 years, and Agreement States every 4 years. However, these frequencies can be adjusted downward on the basis of the findings from the last review, or in light of significant program changes in a particular State or region." We are not aware of any findings or significant program changes that would warrant our next review to be scheduled prior to March 2001.

November 2000 is unacceptable to the Department for an IMPEP review. I, and most key members of my staff, already have commitments for this time period and are not available to participate in an IMPEP review. We assumed based on NRC written and oral communication that our IMPEP review would not be until the March 2001 time frame. Therefore, we have already planned other activities prior to this period.



recyclable

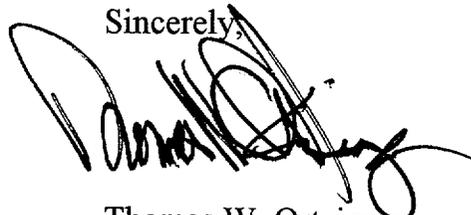
DSP-006 completed
RIDS code: SP07

August 23, 2000

Joe Klinger of our Department recently contacted Ms. Linda McLean, whom we understand will be the Team Leader for our IMPEP review, and she indicated that her calendar is also open during the March 2001 period. Therefore, we request that you revise your draft schedule accordingly and we look forward to working with your staff on our next IMPEP review. As indicated in the IMPEP management directive 5.6, please reserve reduced frequencies of Agreement State programs for problematic ones where additional efforts are warranted.

We look forward to a revised schedule for our IMPEP review. If you have any questions regarding this matter, please contact me at (217) 785-9868.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas W. Ortziger', written over a large, stylized flourish.

Thomas W. Ortziger
Director

TWO:kjg