

July 10, 2001

MEMORANDUM TO: Lance Rakovan, STP

FROM: Cynthia D. Pederson, Director, DNMS /*RA*/

SUBJECT: RESPONSE TO IMPEP WORKING GROUP SURVEY

Thank you for the opportunity to provide our comments on the IMPEP process. The completed survey form for Region III DNMS is attached in response to Kathy Schneider's June 11, 2001, e-mail. Responses from Region III IMPEP team members will be sent under separate cover.

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# IMPEP Working Group Survey

On completion of the first cycle of IMPEP reviews, a working group consisting of NRC and Agreement State members has been organized to review the IMPEP program for additional enhancements and lessons learned in order to strengthen the overall process. The following questions are directed to Agreement State Program Directors and NRC Regional Office Division Directors to help the working group determine how the IMPEP process may be improved. We also would like current and past IMPEP team members to answer the questions from their point of view as team members. Please fully explain your responses. Thank you.

STATE or REGION    **NRC Region III**

CONTACT NAME    **Jim Lynch**

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1.    Describe your overall impression of the IMPEP program, including any strengths or weaknesses.

**The IMPEP program is an effective evaluation tool for NRC Regions. The teams performing reviews in Region III have been well prepared and effective, resulting in good performance-based reviews.**

**The middle IMPEP finding, “Satisfactory with Recommendations for Improvement” should be changed to “Satisfactory with Areas Needing Improvement” to eliminate confusion with performance indicators found “Satisfactory” and having one or two minor recommendations.**

2.    How could the pre-review process, including the IMPEP questionnaire, be improved?

**Pre-IMPEP coordination with Region III has been excellent. We encourage continued emphasis on inspector accompaniments as an important aspect of the review. We provided comments on the IMPEP questionnaire in response to the State and Tribal Programs’ June 28, 2000 memorandum.**

3.    Is the length of current on-site IMPEP reviews (approx. 1 week plus accompaniments) appropriate? If not, how should it be altered?

**The week-long schedule, plus accompaniments prior to the on-site review, is appropriate for the Region.**

4. IMPEP uses five “common” performance indicators: Status of Materials Inspection Program; Technical Quality of Inspections; Technical Staffing and Training; Technical Quality of Licensing Actions; and Response to Incidents and Allegations. Should any of these indicators be altered or deleted? Are there any other indicators that should be added?

**Although MD 5.6 does not require the review of licensing timeliness, we think that, at least for Regional reviews, licensing timeliness is an important aspect of our program as it relates to customer service and public confidence. This is an area that our Program Office tracks and would be an appropriate item for the IMPEP team to review.**

5. IMPEP uses six “non-common” performance indicators: Legislation and Program Elements Required for Compatibility; Sealed Source and Device Evaluation Program; Low-Level Radioactive Waste Disposal Program; Uranium Recovery Program; Regional Fuel Cycle Inspection Program; and Site Decommissioning Management Plan (SDMP). Should any of these indicators be altered or deleted? Are there any other indicators that should be added?

**These indicators are adequate.**

6. Are the performance indicators used in a performance-based manner, when appropriate?

**Yes, our experience with the IMPEP process has shown that it is a performance-based approach. Prior to a recent review, Region III identified an oversight in scheduling of initial license inspections. Corrective actions were taken and the IMPEP team rightly gave the Region credit for its proactive effort.**

7. Are IMPEP review team communications to State/Regional management adequate during reviews and at the appropriate management level?

**The IMPEP team leaders have provided daily updates to Division management during reviews. This approach has eliminated any “surprises” at the end of the review. Exit meetings with the Regional Administrator were well done.**

8. IMPEP teams typically have one Agreement State member. Is this adequate representation? If not, is your program willing to provide additional staff for the teams (States only)?

**It is appropriate for IMPEP teams to have State members. Considering that Agreement States license a large majority of materials licenses, it would seem that the number of State team members may be increased for effective resource utilization. The National Materials Program working group is currently analyzing the alliance concept for NRC and Agreement States. The makeup of IMPEP teams should be tied to this effort.**

9. Typical IMPEP review frequency is four years. Is this frequency appropriate? If not, is your program willing to provide additional staff for more frequent reviews?

**The four-year frequency is adequate.**

10. The Management Review Board (MRB) is made up of several senior NRC managers and one Agreement State senior manager. Is this makeup effective?

**This makeup is effective.**

11. Should the Agreement State member of the Management Review Board be a voting member?

**Yes, the Agreement State member should have an equal voice in MRB decision making.**

12. Is the current IMPEP timeline, including the amount of time allotted for State/Region feedback on the draft report and issuance of the final IMPEP report within 104 days of the on-site review, adequate?

**Yes, this timeline provides feedback to the Region in a reasonable time.**

13. Are Periodic Meetings valuable? If not, what other method could be used to evaluate programs between IMPEP reviews? How do you propose we pay the cost of other methods?

**Not applicable to Regions. We plan to perform self-assessment between IMPEP reviews.**

#### ADDITIONAL QUESTIONS FOR IMPEP TEAM MEMBERS

1. Is training adequate for IMPEP team members? Do you feel that you have sufficient resources and assistance to participate on IMPEP teams?

**N/A**

2. Did anything impede your effectiveness as an IMPEP team member? If so, how could these issues be resolved?

**N/A**