

## Appendix A

### Resolution of Previous IMPEP Findings (Findings on page 8 of report dated August 11, 1999)

#### RECOMMENDATION 1

“The team recommends that checklists be used and retained in the SS&D file as recommended in Item 10, NUREG-1556, Vol 3.”

In response to the IMPEP draft report (NRC letter to Floyd Hamiter, dated July 12, 1999), we agreed with this recommendation. We also stated that, subsequent to the publication of NUREG-1556, Vol 3., we had commenced using the checklist and placing it into the docket file in the Fall of 1998.

In our current practice, we have used the checklists consistently since the IMPEP audit, and the checklists have been included in permanent records. Two methods are used: (1) hard copies are scanned into ADAMS when we close out the case; (2) electronic copies, when used, are entered into ADAMS also at the time of close-out. Prior to the implementation of ADAMS (i.e. prior to April 2000), we had placed the hard copy of the checklist into the docket file.

#### RECOMMENDATION 2

“The team recommends that NRC review when registry sheets should be updated to current standards and, in consultation with the Agreement States, develop guidance, e.g., when they are amended.”

The draft of the IMPEP report (NRC letter to Floyd Hamiter, dated July 12, 1999) stated a stronger position: a full update should be done with each amendment. We responded that such an extensive update would imply a more substantial review than requested by the applicant (e.g. an address change), and would also put unnecessary burden on the staff and the applicant. The final IMPEP report contained a revised recommendation to develop guidance.

We believe the existing guidance in NUREG-1556, Vol 3. (Section 13) is appropriate. Specifically, we conduct a full review when safety issues are involved; and we make partial changes when administrative issues are involved.

When NUREG-1556, Vol 3. is revised, we will review this guidance and coordinate with the Agreement States on any revision.

### RECOMMENDATION 3

“The team recommends that the working life of each product be routinely added to the Conditions of Normal Use on each registry sheet per Item 12.6 of NUREG-1556, Vol 3.”

In response to the IMPEP draft report (NRC letter to Floyd Hamiter, dated July 12, 1999), we agreed with this recommendation.

Currently, we follow NUREG-1556, Vol.3. We include working life in the registry sheets of traditional devices. Note that working life need not be addressed for sources with short half-lives, e.g. yttrium microspheres.

### RECOMMENDATION 4

“The review team recommends that NRC, in consultation with the Agreement States, develop a process to identify and resolve areas of mutual concern in the SS&D review process.”

In response to the IMPEP draft report (NRC letter to Floyd Hamiter, dated July 12, 1999), “we suggest[ed] that this issue be removed from the list of Recommendations due to the fact that this is outside the scope of MD 5.6 for the review of SS&D programs.” However, the Management Review Board directed that it be retained.

In the meantime, we convened a Working Group on SS&D, which included Agreement State representatives, and that Group has issued its report. We will also coordinate with the Agreement States when NUREG-1556, Vol.3., is revised. Therefore, we consider this recommendation closed.

### RECOMMENDATION 5

“The review team recommends that NRC should discontinue the practice of permitting individuals with restricted signature authority to sign as a second reviewer, and re-evaluate the remaining 7 sheets cosigned by staff members with limited signature authority.”

In response to the IMPEP draft report (NRC letter to Floyd Hamiter, dated July 12, 1999), we accepted the recommendation. We explained that the procedure in question was in place for a 3-week period, when we were short of staff with full qualifications, and that only 10 cases were processed in this fashion. Three of the 10 cases were reviewed by the team and no safety issues were identified.

The remaining 7 cases were reviewed by the Branch Chief/MSIB, and no safety issues were identified.

The practice of issuing restricted signature authority has been discontinued.

Attachments:

- Final IMPEP report, dated August 11, 1999 (w/o Enclosures)
- NRC letter to Floyd Hamiter, dated July 12, 1999