

January 9, 2003

ALL AGREEMENT STATES, MINNESOTA, PENNSYLVANIA, WISCONSIN

**OPPORTUNITY TO COMMENT ON DRAFT OPTIONS FOR NEW PERIODIC MEETING PROCEDURES (STP- 03-002)**

Enclosed for your review and comment is a draft summary document on "Options for Enhancing Periodic Meetings." This document has been developed in accordance with recommendation 3-1 of the IMPEP Lessons Learned Working Group Report. You can access the report at the following URL: <http://www.hsr.d.gov/nrc/special/impep14-1-02.pdf>.

This document reflects two proposed options for handling Periodic Meetings in the future. On pages 6-9 of the document you will find a set of briefing charts that describe and compare how each area will be evaluated under each option. Flexibility will be given to States to use either option.

We would appreciate receiving your comments\* within 45 days from the date of this letter. Thank you for your attention to this matter. If you have any questions regarding this correspondence, please contact me on 301-415-3340 or the individual named below.

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Enclosure:  
As stated

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\*This information request has been approved by OMB 3150-0029, expiration 06/30/04. The estimated burden per response to comply with this voluntary collection is approximately 6 hours. Forward any comments regarding the burden estimate to the Information and Records Branch (T-6F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0029), Office of Management and Budget, Washington, DC 20503. If a document does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information.

STP-03-002

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# Options for Enhancing Periodic Meetings Procedure

# IMPEP WORKING GROUP REPORT

## RECOMMENDATION 3-1

- Significant changes to the periodic meeting process be made
- Focus: Becoming an effective tool for determining Agreement States performance
- Changes should include:
  - Use of self-audits with appropriate flexibility for the size of the program
  - States should be sent a copy of the previous IMPEP review questionnaire for update
  - Continue to pilot the use of MRB meetings
  - Provide updates on periodic meeting results to ensure States and NRC management are informed of program issues outside IMPEP cycle.

# Two Options

- Self Audit
- Review of Key Program Areas

# OPTION 1: Self Audit

- States Perform Self-Audits
- Review and Discuss at Periodic Meetings
- Attach to Periodic Meeting Report

## OPTION 2: Review of Key Program Areas

- RSAO and ASPO will discuss Program Performance and current status of Key Program Areas with Program Director during Periodic Meetings
- Conduct limited review of State records
- Document Status of Key Program Areas in Periodic Meeting Report

**OPTION 1**  
**Self Audits**

- I. Address existing Elements of Periodic Meeting Procedures
- II. States will
  - A. Conduct self audit
    - 1. Required Elements
      - a. All or selected IMPEP Common and Non Common Performance Indicators
      - b. Discuss and examine, if appropriate:
        - 1) Unusual/significant authorizations for use of radioactive materials
        - 2) Emerging technologies
        - 3) Significant Events and Generic Implications
      - c. Status of actions to address previous IMPEP findings
    - 2. Frequency of Self Assessments
      - a. Prepared and available two weeks before the periodic meeting
    - 3. Guidance
      - a. Follow State or NRC self -adit procedures
        - 1. State's procedures should be compatible with NRC Procedures

**OPTION 2**  
**Review of Key Program Areas**

- I. Address existing Elements of Periodic Meeting Procedures
- II. RSAO and ASPO to perform the following
  - A. Review of Key Program Areas and conduct limited review of State Records
    - 1. Required Elements
      - a. Status of the following Key Program Areas:
        - 1) Staffing and Training
        - 2) Status of Materials Inspection Program
        - 3) Status of Licensing Actions including (if applicable)
          - a) SS&D evaluations
          - b) Uranium Mills Program
          - c) Low Level Waste Program
        - 4) Event Reporting
        - 5) Status of Response to Incidents and Allegations
        - 6) Status of Regulations
      - b. Discuss and examine, if appropriate:
        - 1) Unusual/significant authorizations for use of radioactive materials
        - 2) Emerging Technologies
        - 3) Significant Events and Generic Implications
        - 4) Results of the State's activities to ensure technical quality of licensing, inspections and response to incidents and allegations (e.g., management or peer reviews of licensing actions and incidents response, inspection accompaniments)
      - c. Status of actions to address previous IMPEP findings
  - 2. Frequency of Review of Key Program Areas
    - a. Performed during each periodic meeting
  - 3. Guidance
    - a. Self-Audit Procedures and IMPEP criteria (i.e., MD 5.6 and/or SAs)

4. Self-audit report discussed with State Program Manager
  - a. Signed report attached to Periodic Meeting Report

5. Publicly available

### III. Roles

#### A. In addition to current roles, RSAO and ASPO should:

1. Review State's Self Audit Reports prior to the meeting
2. Discuss with State Program Manager at meetings
3. Attach self-audit report to periodic meeting report

#### B. RSAO-Lead

1. Draft a meeting report including
  - a. List of meeting attendees
  - b. Brief synopsis of what was discussed during the meeting
  - c. Status of all open recommendations and suggestions
  - d. Key facts or changes (positive and negative) which could affect the focus and timing of future IMPEP reviews, or program implementation.
2. Attach self-audit report to final meeting report
3. Provide draft report to State Program Director, Regional Management, STP Deputy Director, the ASPO and IMPEP Senior Project Manager for comments/IMPEP coordination within 30 days after the meeting for review and comments.
4. Provide and discuss final report with the MRB

#### C. States

1. Provide an electronic copy of the self audit report to the RSAO and ASPO two weeks prior to the meeting.
2. Provide original report signed by the State Program Managers to the RSAO/ASPO at the meeting.

4. Review and discuss conclusions with State Program Manager
  - a. Status of Key Program Areas Documented and attached to Periodic Meeting Report

5. Publicly available

### III. Roles

#### A. In addition to current roles, RSAO and ASPO should:

1. Review status of Key Program Areas
2. Conduct limited file review of State records
3. Discuss conclusions of the review with State Program Manager
4. Document status of Key Program Areas and attach to Periodic Meeting Report

#### B. RSAO-Lead

1. Draft a meeting report including
  - a. List of meeting attendees
  - b. Brief synopsis of what was discussed during the meeting
  - c. Status of all open recommendations and suggestions
  - d. Key facts or changes (positive and negative) which could affect the focus and timing of future IMPEP reviews, or program implementation.
2. Attach documented status of Key Program Areas to final meeting report
3. Provide draft report to State Program Director, Regional Management, STP Deputy Director, the ASPO and IMPEP Senior Project Manager for comments/IMPEP coordination within 30 days after the meeting for review and comments.
4. Provide and discuss final report with the MRB.

#### C. States

1. Follow current procedure with revisions to reflect new process.
2. Discuss current status of program including analysis of key program areas
3. Designate state staff that will assist RSAO and ASPO in performing limited review of state records.

IV. Review of allegations and concerns referred by NRC for action

A. No change – follow current procedure

V. IMPEP Questionnaire

A. No change – follow current procedure

1. i.e., - Not necessary for the Periodic Meeting since self audit reports will be available

VI. Meeting's Length

A. One day

VII. Program Impacts

A. NRC

1. Revise STP Procedure SA-116
2. Develop self-audit procedure
  - a. Review currently available State and regional self-audit procedures
3. Share revised procedure with States for comments
4. Prepare and issue final procedure
5. Minimal (2-3 days) of additional time to review self-audit report before the meeting and to complete meeting report

B. States

1. Self Audits
  - a. Additional burden for State Program's Staff
    - 1) Perform Audit
    - 2) Write Report

IV. Review of allegations and concerns referred by NRC for action

A. No change – follow current procedure

V. IMPEP Questionnaire

A. Prior to the meeting the State will be provided a summary of the information that should be available and discussed during the periodic meeting including information on the status of key program areas

VI. Meeting's Length

A. One to three days

1. Determined by:
  - a. Size of the Program
  - b. Complexity of the Program

VII. Program Impacts

A. NRC

1. Meeting's length
  - a. Up to three days
    - 1) Increased per diem
2. Additional duties for RSAO and ASPO
  - a. Additional time required to discuss and document status of key Program Areas
  - b. Draft Report including documented status of key Program Areas

B. States

1. Develop and provide background information and data on key program areas for review during the periodic meeting

## Sample Schedules for IMPEP Cycles

### I. Four Year Cycle with Two Periodic Meetings (Example)

- December 2000 - IMPEP
- August 2001 - Conference call (8 months after IMPEP)
- April 2002 - Periodic Meeting (8 months after 1<sup>st</sup> conference call)
- December 2002 - Conference call (8 months after 1<sup>st</sup> Periodic Meeting)
- August 2003 - Periodic Meeting (8 months after 2<sup>nd</sup> conference call)
- April 2004 - Conference call (8 months after 2<sup>nd</sup> Periodic Meeting)
- December 2004 - IMPEP

### II. Three Year Cycle with Mid Term Periodic Meeting (Example)

- December 2000 - IMPEP
- September 2001 - Conference call (9 months after IMPEP)
- June 2002 - Periodic Meeting (Mid-Term)
- March 2003 - Conference call (9 months after Periodic Meeting)
- December 2003 - IMPEP

- Flexibility will be given to States to use either option