



**STP Procedure Approval**  
***Heightened Oversight and Monitoring***

***SA-122***

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***NOTE***

***The STP Director's Secretary is responsible for the maintenance of this master copy document as part of the STP Procedure Manual. Any changes to the procedure will be the responsibility of the STP Procedure Contact.***



**Procedure Title: *Heightened Oversight  
and Monitoring***

**Procedure Number: SA-122**

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## **I. INTRODUCTION**

This document describes the procedures used by the Nuclear Regulatory Commission (NRC) to conduct heightened oversight or monitoring of an Agreement State program.

## **II. OBJECTIVES**

- A. To provide the guidelines that will be followed by the NRC when significant weaknesses are identified in an Agreement State radiation control program, which do not necessitate probation, immediate suspension or termination of the agreement.
- B. To ensure that progress is being made to improve performance of the program relative to the areas identified as needing improvement, without degradation of other parts of the Agreement State's radiation control program.
- C. To ensure an Agreement State on heightened oversight or monitoring understands the process, their role, and any actions expected of them.
- D. To assist an Agreement State in restoring the radiation control program's performance to the criteria identified in Management Directive (MD) 5.6, *Integrated Materials Performance Evaluation Program (IMPEP)*.

## **III. BACKGROUND**

- A. Section 274j of the Atomic Energy Act gives the Commission authority and responsibility for ensuring that Agreement State programs continue to provide adequate protection of public health and safety and are compatible with NRC's program. In cases where the Commission finds that significant program weaknesses exist regarding the adequacy and/or compatibility of the Agreement State's program, several options are available to ensure continued protection of the public.
- B. If the areas needing improvement are serious enough such that the NRC determines that the program is inadequate to protect public health and safety, probation, emergency suspension or termination of the Agreement State program should be considered. If the areas needing improvement are not so serious as to find the program inadequate to protect public health and safety, either heightened oversight or monitoring of the Agreement State program, by NRC, is warranted.

- C. Heightened oversight is a formalized process which allows the NRC to maintain an increased level of communication with an Agreement State program experiencing significant program weaknesses. It allows NRC to understand the actions being taken and the implementation schedule for those actions that address the weaknesses identified in the Agreement State program. The decision to place an Agreement State program on heightened oversight is made by the Management Review Board (MRB) based on the results of an IMPEP review, a periodic meeting, or other interaction with the Agreement State program. (See Section V. for criteria).
- D. Monitoring is an informal process which allows the NRC to maintain an increased level of communication with an Agreement State program. Monitoring is implemented in cases where weaknesses in a program have resulted in, or could result in, less than fully satisfactory performance for one or more performance indicators. Monitoring may be considered based on results of an IMPEP review, a follow-up IMPEP review, or a periodic meeting, or other interaction with the Agreement State program.

#### **IV. ROLES AND RESPONSIBILITIES**

- A. Management Review Board (MRB):
  - 1. Makes the final decision on the adequacy and compatibility of an Agreement State program under IMPEP.
  - 2. Determines whether an Agreement State program will be placed on heightened oversight based on the results of an IMPEP review, a periodic meeting, or other interaction with the Agreement State program.
  - 3. Determines whether an Agreement State program will be placed on monitoring based on the results of IMPEP reviews, periodic meetings or other information provided to the MRB.
  - 4. Designates a period of time for the heightened oversight or monitoring process.
  - 5. Considers improvements made by an Agreement State program and the resolution of the IMPEP review team's recommendations to determine if the heightened oversight process should be discontinued. Results from a follow-up IMPEP review will provide a basis for the decision.

6. Considers improvements made by an Agreement State program and the resolution of the IMPEP team's recommendations to determine if the monitoring process should be discontinued. Results from IMPEP reviews, periodic meetings or other information provided by the State may provide a basis for the decision.
7. In the event an Agreement State does not correct the weaknesses that led to heightened oversight status, the MRB may elect to continue the heightened oversight process or may direct the Office of State and Tribal Programs (STP) to prepare a Commission paper requesting approval for an appropriate next action. Options for appropriate next actions may be found in the following STP Procedures: SA-113, *Placing an Agreement State on Probation*; SA-114, *Suspension of a Section 274b Agreement*; or SA-115, *Termination of a Section 274b Agreement*.

B. Director, Office of State and Tribal Programs:

1. Keeps the MRB informed of the status of Agreement State programs that are subject to the heightened oversight or monitoring process.
2. Coordinates follow-up IMPEP reviews (see STP Procedure SA-119, *Follow-up IMPEP Reviews*) of Agreement State programs.
3. Reports annually to the Commission on the status of Agreement States on heightened oversight or monitoring.
4. Prepares the letter transmitting the final IMPEP report to the Agreement State. (See Appendix A for an example of a letter.)
5. Prepares and transmits notification of Agreement States placed on heightened oversight and monitoring to the Commissioners' assistants through the Office of the Executive Director for Operations.
6. Prepares, based on the MRB's consideration of the results of the follow-up review, a Commission paper requesting approval for additional actions if the Agreement State program does not address the weaknesses that led to heightened oversight status. The Commission paper will include the status of the Agreement State program, recommendations of the MRB, and any other pertinent information.

C. IMPEP Team Leader:

1. Recommends to the MRB whether an Agreement State program should be placed on heightened oversight or monitoring, based on the results of an IMPEP review or a follow-up IMPEP review of the Agreement State program.
2. Provides assistance and support to the Regional State Agreements Officer (RSAO) for heightened oversight or monitoring activities.

D. Regional State Agreements Officer:

1. Leads and coordinates heightened oversight or monitoring activities with the Agreement State program management and other NRC staff.
2. Prepares and coordinates draft agendas for each heightened oversight or monitoring conference call with the Agreement State program management and other NRC staff. (See Appendix B for a sample conference call agenda.)
3. Prepares minutes of all conference calls relating to the heightened oversight or monitoring process, and coordinates the minutes with the Agreement State program management and other NRC staff to ensure a clear understanding of discussions. (See Appendix C for sample conference call minutes.)
4. Ensures that heightened oversight or monitoring correspondence, such as letters, conference call minutes and e-mail messages, is entered into NRC's Agencywide Documents Access and Management System (ADAMS).
5. Participates, as a team member, on follow-up IMPEP reviews.
6. Recommends monitoring of an Agreement State program to STP in coordination with the Agreement State Project Officer (ASPO) for consideration by the MRB, based on the results of periodic meetings, orientation meetings or other communications with an Agreement State program.
7. Reviews and comments on the program improvement plan submitted by an Agreement State on heightened oversight.

E. Agreement State Project Officer :

1. Participates, in coordination with the RSAO, in heightened oversight or monitoring activities.
2. Participates in conference calls for assigned Agreement States.
3. Reviews and comments on the program improvement plan submitted by an Agreement State on heightened oversight.

F. IMPEP Team Member:

Participates, in coordination with the RSAO, in heightened oversight or monitoring activities, as requested.

G. Agreement State Program Management:

1. Coordinates heightened oversight or monitoring activities with NRC.
2. Develops and implements a program improvement plan during the heightened oversight period.
3. Prepares and submits periodic progress reports during the heightened oversight period.
4. Participates in heightened oversight or monitoring conference calls.

**V. GUIDANCE**

A. Heightened Oversight Criteria

1. If the MRB finds an Agreement State program is unsatisfactory for one or more common or non-common performance indicators, the MRB will consider placing the program on heightened oversight as described in MD 5.6.
2. The MRB may decide to place an Agreement State program on heightened oversight based on the results of a periodic meeting or other interactions with the Agreement State program. The loss of key State personnel, a shift in

resources to address specific State priorities, a pattern of weak State responses to events or deliberate misconduct on the part of a State official could be factors in the decision process.

3. The MRB may consider heightened oversight, as opposed to probation or suspension, if senior Agreement State management make strong commitments to improve their program. The MRB should be confident that the State is capable of implementing those commitments and that the actions by the Agreement State will result in necessary program improvements.
4. The normal duration of the heightened oversight process is one year unless otherwise directed by the MRB. (See Section V.C.3 for guidance on MRB action to extend or discontinue heightened oversight.)

**B. Monitoring Criteria**

1. Monitoring of an Agreement State program may be appropriate if heightened oversight is not warranted, but a program performance weakness is identified during an IMPEP review, a periodic meeting, or other information provided by an Agreement State program.
2. Monitoring may also be considered, after implementation of a program improvement plan under heightened oversight, to provide continued assurance that an Agreement State maintains a fully adequate and compatible radiation control program.
3. The normal duration of the monitoring process is until the next IMPEP review or periodic meeting unless otherwise directed by the MRB.

**C. Required Elements of Heightened Oversight and Monitoring**

1. Heightened Oversight
  - a. State program improvement plan.

The program improvement plan should be comprehensive and include actions to address the recommendations in the final IMPEP report. It should fully discuss root causes for weaknesses and include short- and long-term corrective actions that target the identified root causes. The plan should also contain dates of expected actions, products and indicate the person(s) responsible for each product. (See Appendix D

for an example of a program improvement plan.) The program improvement plan should be submitted to the Chair of the MRB within 30 days of receipt of the final IMPEP report. The program improvement plan will be reviewed by the RSAO and ASPO. Preliminary review results will be discussed at the first conference call. A formal letter from the Chair of the MRB will be sent to the Agreement State acknowledging receipt of the program improvement plan. The letter will include any comments from the review of the program improvement plan.

b. Periodic progress reports.

The reports should be brief, concise summaries of the status of State actions and include an updated program improvement plan. The report and updated program improvement plan should be sent to the RSAO approximately two weeks before the next scheduled conference call.

c. Periodic NRC/State conference calls.

- i. These calls are designed to maintain open communications between the Agreement State and NRC. The calls should involve Agreement State management responsible for improving the program and the IMPEP team leader, the ASPO, the RSAO, and other NRC or State staff as needed.
- ii. A draft agenda, coordinated with Agreement State management and NRC staff, should be prepared by the RSAO and distributed at least one week prior to the call.
- iii. The periodic calls normally occur bimonthly unless otherwise directed by the MRB.
- iv. As elements of the program improvement plan are completed by the Agreement State, the accomplishments should be noted in the conference call summaries and need not be included in future State progress reports.



2. Monitoring
  - a. Under monitoring, a State does not need to prepare or submit a program improvement plan or written periodic progress reports.
  - b. Periodic NRC/State conference calls.
    - i. These calls are designed to maintain open communications between the Agreement State and NRC. The calls should involve Agreement State management responsible for improving the program and the RSAO, the ASPO, and other NRC staff as appropriate.
    - ii. A draft agenda, coordinated with Agreement State management and NRC staff, should be prepared by the RSAO and distributed at least one week prior to the call.
    - iii. The periodic calls will occur at a frequency agreed upon by the MRB and the State.
3. Follow-up review by an IMPEP team.
  - a. The MRB will normally determine if, and when, a follow-up IMPEP review should be performed to evaluate State progress in resolving weaknesses. (See STP Procedure SA-119 for additional information on follow-up reviews.)
  - b. The results of a follow-up IMPEP review may be the basis for the MRB's decision to continue or cease the heightened oversight process.
    - i. If the MRB finds the Agreement State program is satisfactory for all performance indicators, the MRB should consider discontinuation of the heightened oversight process.
    - ii. If the MRB finds the Agreement State program is improving and resolving the recommendations from the last IMPEP review but is satisfactory with recommendations for improvement in one or more performance indicators, the MRB should consider taking the State off of heightened oversight and placing the State on monitoring.

- iii. If the MRB finds the Agreement State program is not improving or resolving the recommendations from the last IMPEP review and is unsatisfactory for one or more performance indicators, the MRB may elect to continue the heightened oversight process or may direct STP to prepare a Commission paper requesting approval for an appropriate next action.

D. Additional Actions for Programs Placed on Heightened Oversight or Monitoring

1. Letter Transmitting Final IMPEP Report.

If the root cause of program weaknesses identified during the IMPEP review is determined to be fiscal concerns, the MRB may direct that additional language be inserted into the cover letter for the final IMPEP report to bring these issues to the attention of Agreement State senior management. Fiscal concerns include budget, staffing and resource concerns and shortfalls. Communication with Agreement State senior management may facilitate necessary actions to address the fiscal concerns affecting the Agreement State radiation control program.

2. NRC/State management meetings.

The NRC may offer to meet with Agreement State officials to discuss State actions to improve the radiation control program.

3. NRC technical assistance.

NRC and the Agreement States may discuss NRC technical assistance in accordance to guidance in MD 5.7, *Technical Assistance to Agreement States*.

## VI. APPENDICES

- Appendix A - Sample Letter Transmitting Final IMPEP Report
- Appendix B.1 - Sample Heightened Oversight Conference Call Agenda
- Appendix B.2 - Sample Monitoring Conference Call Agenda
- Appendix C.1 - Sample Heightened Oversight Conference Call Summary
- Appendix C.2 - Sample Monitoring Conference Call Summary
- Appendix D - Sample Program Improvement Plan

**VII. REFERENCES**

1. NRC Management Directive 5.6, *Integrated Materials Performance Evaluation Program.*
2. NRC Management Directive 5.7, *Technical Assistance to Agreement States.*
3. STP Procedure SA-100, *Implementation of the Integrated Materials Performance Evaluation Program (IMPEP)*
4. STP Procedure SA-106, *Management Review Board*
5. STP Procedure SA-112, *Emergency Suspension of a Section 274b Agreement*
6. STP Procedure SA-113, *Placing an Agreement State on Probation*
7. STP Procedure SA-114, *Suspension of a 274b Agreement*
8. STP Procedure SA-115, *Termination of a 274b Agreement*
9. STP Procedure SA-116, *Periodic Meetings with Agreement States Between IMPEP Reviews*
10. STP Procedure SA-119, *Follow-up IMPEP Reviews*

# APPENDIX A

## Sample Letter Transmitting Final IMPEP Report

[NAME]  
[TITLE, STATE SENIOR MANAGEMENT]  
[ADDRESS]

Dear [NAME]:

On [DATE], the Management Review Board (MRB) met to consider the proposed final Integrated Materials Performance Evaluation Program (IMPEP) report on the [STATE] Agreement State program. The IMPEP review was conducted [DATE]. The MRB had received for consideration the comments in [NAME]'s letter dated [DATE]. The MRB found the [STATE] program adequate but needs improvement, and [NOT] compatible with NRC's program. Because of the significance of the concerns, the MRB recommends heightened oversight of the [STATE] program.

[IF DIRECTED BY THE MRB, INSERT PARAGRAPH DETAILING FISCAL ISSUES IDENTIFIED AS ROOT CAUSES OF PROGRAM WEAKNESSES. FISCAL ISSUES INCLUDE BUDGET, STAFFING AND RESOURCE SHORTFALLS OR CONCERNS.]

I request that bimonthly conference calls take place with the appropriate [STATE] and NRC staffs to discuss the status of the program. The Regional State Agreement Officer will coordinate the bimonthly conference calls. I request that, two weeks prior to the calls, you submit a brief status report on the activities conducted since the last report and the necessary statistical data.

I also request that you prepare and submit a program improvement plan (the plan) that addresses the recommendations in Section 5 of the enclosed final report. I request that the plan be submitted within 30 days of receipt of this letter. Upon review of the plan, the staff will provide comments on the plan, will schedule the first conference call and will provide a more detailed outline for the status reports. I request the initial conference call be scheduled and conducted no later than [DATE].

Based on the results of the current IMPEP review, a follow-up review will be scheduled during the period [TIMEFRAME]. The follow-up review will cover the State's action on the recommendations from the [DATE] review.

I appreciate the courtesy and cooperation extended to the IMPEP team during the review and your continuing support of the [NAME OF AGREEMENT STATE ORGANIZATIONAL UNIT]. I look forward to our agencies continuing to work cooperatively in the future.

Sincerely,

[NAME]  
Deputy Executive Director for Materials,  
Research and State Programs

Enclosure:  
As stated

cc:

# APPENDIX B.1

## Sample Heightened Oversight Conference Call Agenda

**Date:** [DATE]

**Time:** [TIME]

Non-NRC Participant Telephone Number:

Dial [PHONE NUMBER]; enter Access Code [NUMBER]

NRC Participant Telephone Number:

Dial [PHONE NUMBER]; enter Access Code [NUMBER]

### Discussion Items

1. Status of Actions in [DATE] letter
  - a. [LIST ACTIONS TO BE DISCUSSED, SUCH AS PERFORMANCE INDICATORS IDENTIFIED WITH PROBLEMS FROM THE IMPEP REVIEW]
  - b.
  - c.
2. Discussion of Changes to Items or Dates for Completion
3. Potential Timeframe for Follow-Up Review
4. Date for Next Conference call (Date and Time)

Attached are the minutes from the [DATE - PREVIOUS CALL] conference call and [STATE'S] [DATE] status letter. STATE previously submitted status letters in [LIST DATES] addressing recommendations in the IMPEP report and the necessary actions in the heightened oversight program.

If you have any questions, please call me at [PHONE NUMBER]

[REGIONAL STATE AGREEMENT OFFICER]

## APPENDIX B.2

### Sample Monitoring Conference Call Agenda

**Date:** [DATE]

**Time:** [TIME]

Non-NRC Participant Telephone Number:

Dial [PHONE NUMBER]; enter Access Code [NUMBER]

NRC Participant Telephone Number:

Dial [PHONE NUMBER]; enter Access Code [NUMBER]

#### **Discussion Items**

1. Discussion of Performance Indicators
  - a. [LIST PERFORMANCE INDICATORS IDENTIFIED WITH PROBLEMS FROM THE IMPEP REVIEW]
  - b.
  - c.
2. Status of Open Recommendations
3. Date for next Conference Call (Date and Time)

Attached are the minutes from the [DATE - PREVIOUS CALL] conference call.

If you have any questions, please call me at [PHONE NUMBER]

[REGIONAL STATE AGREEMENT OFFICER]

# APPENDIX C.1

## Sample Heightened Oversight Conference Call Summary

[STATE]: [DATE]

The minutes are presented in the same general order as the items were discussed in the meeting. The participants were as follows:

[TEAM LEADER]	[RSAO]
[STP MANAGER]	[REGIONAL MANAGER]
[LIST STATE PARTICIPANTS]	[ASPO]
[LIST OTHER NRC PARTICIPANTS]	

**1. Status of Actions in [DATE] Letter**

[LIST ACTIONS] [SUMMARIZE STATE'S ACTION TO DATE. DOCUMENT DISCUSSIONS WITH STATE REGARDING EACH ACTION]

[LIST ACTIONS] [SUMMARIZE STATE'S ACTION TO DATE. DOCUMENT DISCUSSIONS WITH STATE REGARDING EACH ACTION]

[LIST ACTIONS] [SUMMARIZE STATE'S ACTION TO DATE. DOCUMENT DISCUSSIONS WITH STATE REGARDING EACH ACTION]

**2. Discussion of Changes to Items or Dates for Completion.**

[SUMMARIZE DISCUSSION]

**3. Future Status Reports.** [STATE] will submit a status report prior to the [DATE] conference call.

**4. Date for Next Conference Call (date and time).** The next call was set up for [DAY], [DATE] at [TIME].

**5. Additional Topics.** [DOCUMENT ADDITIONAL DISCUSSIONS AS NEEDED]

## APPENDIX C.2

### Sample Monitoring Conference Call Summary

[STATE]: [DATE]

The minutes are presented in the same general order as the items were discussed in the meeting. The participants were as follows:

[RSAO]  
[LIST STATE PARTICIPANTS]

[ASPO]  
[LIST OTHER NRC PARTICIPANTS]

**1. Discussion of Performance Indicators**

[LIST INDICATOR] [SUMMARIZE STATE'S STATUS TO DATE. DOCUMENT DISCUSSIONS WITH STATE REGARDING EACH INDICATOR]

[LIST INDICATOR] [SUMMARIZE STATE'S STATUS TO DATE. DOCUMENT DISCUSSIONS WITH STATE REGARDING EACH INDICATOR]

[LIST INDICATOR] [SUMMARIZE STATE'S STATUS TO DATE. DOCUMENT DISCUSSIONS WITH STATE REGARDING EACH INDICATOR]

**2. Status of Open Recommendations.**  
[SUMMARIZE DISCUSSION]

**3. Date for Next Conference Call (date and time).** The next call was set up for [DAY], [DATE] at [TIME].

**4. Additional Topics.** [DOCUMENT ADDITIONAL DISCUSSIONS AS NEEDED]



# APPENDIX D

## Sample Program Improvement Plan

Note: This plan should include root causes for weaknesses and include short- and long-term corrective actions. The sample recommendations in this Appendix were identified by the Agreement State program management as root causes of the program weaknesses based on the IMPEP review. The tasks and milestones identified in the table are the short- and long-term corrective actions proposed by the Agreement State program management.

Recommendation	Tasks	Milestones	Assignments	Anticipated Completed Date	Status	Completion Date
Good performance licensee inspection extension	Develop written policy on good performance procedures	Written policy developed	Insert staff name	12/10/01	Completed	12/10/01
		Written policy reviewed	Insert manager name	12/31/01	Completed	12/31/01
		Written policy implemented	Insert staff name	1/15/02	Completed	12/31/01
		Record of adjustment made to licensee files	Insert staff name	2/28/02	Completed	5/6/02
Management measures to insure timely inspections	1. Review overdue inspection list monthly	Prioritize and assign inspections to staff	Insert manager name	12/10/01	Completed	12/08/01
		University A - Broad Licensee inspection	Insert staff name	12/31/01	Completed	12/19/01
		University B - Broad Licensee inspection	Insert staff name	12/31/01	Completed	1/25/02
		Radiographer A inspection	Insert staff name	1/31/02	Completed	2/6/02
		Irradiator Facility A inspection	Insert staff name	4/30/02	Completed	4/16/02
		Medical Broad Licensee inspection	Insert staff name	4/30/02	Completed	4/25/02
	2. Review staffing options	Create health physicist series - 5 step process	Insert manager(s) names	12/18/01	Completed (approved by legislation)	5/24/02
		Review current State Agreement Program organization structure	Insert manager(s) names	6/30/02	In process	
		Review operational processes for efficiency	Insert manager(s) names	8/31/02	In process	
		Consider contracting with private sector	Review options (Insert manager(s) names)	1/31/02	Completed	2/15/02

Recommendation	Tasks	Milestones	Assignments	Anticipated Completed Date	Status	Completion Date
			Review pros & cons (Insert manager(s) names)	2/15/02	Completed	2/15/02
			Decision to proceed (Radiation Control Program Director)	2/28/02	Completed	2/28/01
			Contract approved to hire consultant	4/18/02	Completed	4/18/02
		Consider contracts with past State employees/feds/other States	Draft letter seeking interest of past employees (Insert manager(s) names)			
			Review options (Insert manager(s) names)			
			Review pros & cons (Insert manager(s) names)			
			Response & decision to proceed			
			Draft contract (Insert manager(s) names)			
			Contract submitted to Administration for approval			
	3. Assure better communication regarding expectation of staff deliverables	Review Radiation Control Programs goals and objectives with each staff person	Finalize & send to each staff HP (Insert manager(s) names)	1/31/02 then Quarterly		
		Review status of radioactive materials program goals and objectives and revise if necessary	(Insert manager(s) names)	Quarterly		
	4. Investigate Additional Funding Options	Revise Fees	Secure fee schedules from other States (Insert staff name)			
			Make decision on increases to fees (Insert manager(s) names)			

Recommendation	Tasks	Milestones	Assignments	Anticipated Completed Date	Status	Completion Date
			Secure Technical assistance support in reviewing fees (Insert manager(s) names)			
			Draft Rules (Insert staff names)			
			Initiate Rulemaking (Insert staff names)			
			Final Rule			
			Implementation of new fees (Insert staff names)			
		Redirect Radiation Control Program funds	Draft legislation (Insert manager(s) names)			
			Introduce Legislation (Insert manager(s) names)			
			Approval by Legislation			
Staff training plan development	1. Develop Radiation Control Program tracking sheets	Prepare chart indicating past and needed training of each health physicist (HP)	(Insert manager name)			
	2. Seek/apply for necessary training	Apply for future courses, complete necessary in-house travel forms	(Insert manager(s) and staff names)			
	3. Develop criteria for HP series progression	Review criteria developed by other States	(Insert manager(s) names)			
	4. Define criteria for progression up ladder	Draft and decide on criteria	(Insert manager(s) names)			
Address staff turnover	Review enhancement possibilities	Introduce HP series	Explore other States' HP series job description (Insert manager(s) names)			
			Draft necessary job description			

Recommendation	Tasks	Milestones	Assignments	Anticipated Completed Date	Status	Completion Date
			Write justification for review			
			Review, revise, and submit (Insert manager(s) names)			
		Introduce a workforce development plan	(Insert manager(s) names)			
Examine and change business processes and organization of the Radiation Control Program to improve the effectiveness and efficiency of the program	1. Work with the advisory committee in pursuing recommendations for improvements as noted in rad material survey	Review options with advisory committee. Proceed as directed				
	2. Track with the NRC bi-monthly regarding status of this "Improvement Plan"	Schedule telephone conference with NRC				
		Prepare Program Improvement Plan status report	(Insert manager(s) names)	every 2 months	On going	
Develop and implement an action plan to adopt NRC regulations in accordance with current policy on adequacy and compatibility	Rule Revision	Convert existing rules to Word and proof	(Insert staff names)			
		Review existing rules for changes	(Insert staff names)			
		Determine necessary revisions	(Insert staff names)			
		Draft rules for compatibility	(Insert staff names)			
		Submit rules for public comment	(Insert staff names)			
		Rules issued for 60 days comment period and transmitted to NRC for review	(Insert staff names)			
		Comments resolved and transmitted for final issuance	(Insert staff names)			
		Final regulations sent to NRC for final review	(Insert manager(s) names)			