



## OSP STP Procedure Approval

### *Periodic Meetings with Agreement States Between IMPEP Reviews - SA-116*

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Issue Date:

Expiration Date:

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#### **NOTE**

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**Procedure Title:**  
*Periodic Meetings with Agreement States  
Between IMPEP Reviews*  
**Procedure Number: SA-116**

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**Issue Date:**  
**01/ /2004**

## **I. INTRODUCTION**

This procedure describes the general objectives and process to be followed when scheduling, staffing assigning personnel, conducting, and reporting documenting a periodic meeting with an Agreement State.

## **II. OBJECTIVES**

- A. Designate the proper frequency for periodic meetings. in relation to an Agreement State's Integrated Materials Performance Evaluation Program (IMPEP) review frequency.
- B. Establish procedures for scheduling and conducting a periodic one-day meeting with an Agreement State.
- C. Identify the NRC staff and requested State staff who should participate in a periodic meeting, including the staff responsible for conducting the meeting.
- D. Interpret Define the scope of activities and areas that should for be discussedion during a periodic meeting.
- E. Define methods and timing for documenting and communicating the results of the meeting to the State.
- F. Specify the correct steps to take when concerns are identified during a periodic meeting.
- G. Establish mechanisms to communicate periodic meeting results to the Management Review Board (MRB).

## **III. BACKGROUND**

In their respective Management Review Board (MRB) meetings, At the September 1996 All Agreement States Meeting, the issue of conducting a mid-cycle or periodic meeting was discussed. In Some Agreement States consistently commented on the need for NRC presence on a more frequent basis than once every four years. SECY-96-234, "Status Report on Implementation of the Integrated Materials Performance Evaluation Program," November 12, 1996, it was proposed that periodic one-day meetings with

Agreement States not scheduled for Integrated Materials Performance Evaluation Program (IMPEP) reviews take place ~~in order~~ to help NRC and Agreement States ~~and parties~~ to remain knowledgeable of their respective programs and to ~~conduct planning~~ for the next IMPEP review.

In 1999, the NRC completed its first round of IMPEP reviews for all Agreement States.

A Working Group composed of representatives of Agreement State Programs and the NRC was tasked with conducting an independent examination of the IMPEP experiences to date that could further enhance the program.

The IMPEP Lessons Learned Report categorized changes to the procedure for periodic meetings as high priority, substantive change. Such changes, the report noted, were needed to make the periodic meetings with Agreement States more effective. The Working Group recommended that the periodic meetings should focus on self-audits and on updating the IMPEP questionnaire.

The NRC staff reviewed the periodic meeting procedure to incorporate self-audits as a part of the process. Based on State and NRC comments on this revision and further evolution and changes in the periodic meeting process, guidance on mandatory use of self-audits is not included in the procedure.

The periodic meeting process has evolved to more effectively gather important performance information. The NRC staff has found that this evolution is due to an increased scope of discussions and increased focus on identifying performance issues earlier. New roles and responsibilities have emerged, including an enhanced meeting coordination process, an earlier, more effective and active participation of the MRB in the process, and active Agreement State Radiation Control Program Director (RCPD) participation in the discussion of meeting results and decision making process. In addition, a new Periodic Meetings Coordinator (PMC) position has been established to ensure these new responsibilities are effectively carried out.

This procedure documents current periodic meetings' practices, which include: (1) increased scope of discussion that allows a better sharing of information between the NRC and the States; (2) briefing the MRB on the meeting's results with active participation from State staff; and (3) earlier identification of Program weaknesses (e.g., staffing shortage, inspection backlogs) and implementation of corrective measures.

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

##### **A. IMPEP Project Manager**

The senior IMPEP project manager for IMPEP coordination is responsible for tracking periodic meetings as well as action items identified during the periodic meetings. ~~The senior project manager for IMPEP coordination is responsible for:~~

1. Informing each Regional State Agreements Officer (RSAO) of the proposed IMPEP and periodic meetings schedule for each year.
2. Coordinating and scheduling discussion of the final periodic meeting summary report at the MRB meeting.

##### **B. Periodic Meetings Coordinator**

The PMC is responsible for:

1. Assisting the IMPEP Project Manager and Regional State Agreements Officer (RSAO) in the coordination of periodic meetings.
2. Leading the discussion of the periodic meeting summary report with the MRB when the RSAO and Agreement State Project Officer (ASPO) are not available.
3. Tracking periodic meetings as well as action items identified during the meetings.
4. Identifying any meeting action items that have not been resolved at the time the meeting summary letter is dispatched.
5. Notifying the Office of State and Tribal Programs' (STP) controlled ticket coordinator to formally ticket and assign any items as necessary.
6. Follow-up on the resolution of action items.

##### **BC. Regional State Agreements Officer**

The RSAO is responsible for:

1. Scheduling meetings with each of those Agreement States in his/her Region at the proper appropriate frequency (as defined in Part V. A). ~~The RSAO is responsible for:~~

12. Coordinating a meeting date with the IMPEP Project Manager, ~~Regional management, Agreement State RCPD management, and the OSP and STP Agreement State Project Officer, (ASPO).~~

3. Informing STP Periodic Meetings Coordinator and appropriate Regional management of the meeting date. ~~to assure that a suitable date for the meeting is chosen.~~

~~The senior project manager for IMPEP, coordination, and Regional management as required by Regional procedure or practice, will be informed of the meeting date.~~

24. Developing a draft agenda for the meeting with the RCPD. ~~Agreement State pProgram Director management.~~ (In cases where issues are identified that require the meeting's length to be extended, ~~tThe RSAO and ASPO will also consult with the OSP STP Director management and the ASPO to estimate the length of the meeting-~~ meeting's length).

35. Issuing, once a proposed meeting date has been chosen, a letter to the ~~Agreement State Radiation Control Program Director RCPD,~~ a minimum of 60 days before the meeting, confirming the date for the meeting. The letter should include the draft agenda that was developed ~~jointly in consultation with Agreement State Program management, as well as a request for any comments on the draft agenda and additional specific meeting discussion topics.~~ The Deputy Director, ~~OSP STP,~~ the senior IMPEP ~~pProject mManager,~~ STP Periodic Meetings Coordinator, appropriate Regional management, ~~for IMPEP coordination,~~ and the ASPO should be on the distribution list for the letter. A sample letter is attached as Appendix A.

46. Scheduling and planning for the meeting to ensure that State attendance ~~at the meeting~~ will include at least one Radiation Control Program representative who can speak on behalf of the Agreement State ~~pProgram.~~ (Preferably, the RCPD ~~Agreement State Radiation Control Program Director~~ will attend the meeting). Agreement State ~~pProgram~~ staff attendance at the meeting will be determined by the Agreement State.

57. Familiarizing him or herself with the Agreement State program prior to ~~the meeting.~~ ~~The RSAO should~~ Reviewing all the recommendations and suggestions made during ~~theat~~ most recent IMPEP review (if a previous periodic meeting had been held, review the Program's status as of ~~as well as their status as of~~ the date of the most recent periodic meeting). The RSAO should obtain a detailed printout of all State Nuclear Materials

Events Database (NMED) data since the last IMPEP review or periodic meeting. The RSAO should also be familiar with all allegations and concerns referred to the State for handling since the last IMPEP review or periodic meeting (obtained from the Regional Senior Allegations Coordinator and the Allegation Management System), and the status of the State's regulations as detailed in the Regulation Assessment Tracking System (RATS).

68. Serving as lead facilitator for the meeting. If the RSAO cannot serve as the lead, the RSAO will reschedule the meeting, or request that the ASPO lead the meeting. If the RSAO is unfamiliar with an Agreement State for any reason (e.g., there is a new RSAO or the RSAO was not a member of the previous IMPEP review team), OSP STP and Regional management may choose to send an OSP STP or Regional staff member more knowledgeable about the State to the meeting. This decision will be made on a case-by-case basis. The RSAO will continue to act as the lead for the meeting, if in attendance.
79. ~~Preparing and sending~~ Issuing a final meeting summary and sending an electronic copy of the meeting summary to the Deputy Director, STP, appropriate Regional management, senior IMPEP Project Manager, for IMPEP STP Periodic Meetings Coordination and the ASPO.
10. Leading the discussion of the periodic meeting summary report with the MRB. (The meetings' results should normally be discussed at the next scheduled MRB meeting unless significant concerns identified necessitate a special MRB meeting).

ED. Agreement State Project Officer

The ASPO will normally be responsible for:

1. Attending and participating in the periodic meeting. (An alternate OSP STP staff member may attend the meeting if the ASPO cannot attend).
2. Coordinating and assisting the RSAO in meeting preparation and development of specific information areas to be covered during the meeting, such as event reporting, allegations and the status of regulations.
3. Leading the periodic meeting if necessary or requested.
4. Leading the discussion of the periodic meeting summary report with the MRB when the RSAO is not available.

**E. Agreement State Radiation Control Program Director (RCPD)**

The RCPD (or a designee) will be invited to participate in the discussion of that State’s periodic meeting summary at the MRB meeting. [Also see Sections IV. C. 2, 4, 5 and 6 for additional information on the RCPD’s role].

**F. Management Review Board (MRB)**

The MRB provides a senior level review of the results of the periodic meetings. Its membership includes: Deputy Executive Director for Materials, Research and State Programs (DEDMRS); Director, Office of Nuclear Material Safety and Safeguards (NMSS); Director, Office of State and Tribal Programs (STP); the General Counsel; and an Organization of Agreement State (OAS) Liaison to the MRB. [See: 1) STP Procedure SA-106, “*Management Review Board*,” 2) NRC Management Directive 5.6, “*Integrated Materials Evaluation Program (IMPEP)*”]

The MRB will always be apprized on the results of periodic meetings. The MRB provides directions on a course of action when concerns are identified during a periodic meeting (see V.G. below). Directions on a course of action will be communicated directly to the RCPD or its representative either at the MRB meeting or by letter.

**V. GUIDANCE**

A. For a four (4) year IMPEP cycle, a midterm ~~periodic meetings with Agreement State~~ should take place at the following intervals unless an alternative frequency is decided approximately twenty-four (24) months after the IMPEP review. If additional meetings are required or requested either by ~~upon by~~ OSP STP management or the State, (see V.I., below): the meeting frequency will be adjusted on a case-by-case basis.

IMPEP FREQUENCY	PERIODIC MEETING FREQUENCY
4-year Cycle	16 Months (two meetings in four years)
3-year Cycle	18 Months (one meeting in three years)
2-year Cycle	12 Months (one meeting in three years)

B. The ~~periodic meetings is for~~ serve as forums to hold discussions, to exchange information exchange, to identify identification of potential areas of improvement for both the NRC and Agreement State Programs, to address or define significant

actions and to assess assessment of IMPEP review planning. Periodic meetings are not for a formal evaluations but are open, informal, and interactive discussions of program status and performance, identification of issues and actions for their timely resolution, and other information. They should provide for identification and discussion of any program areas experiencing difficulties or program changes (e.g., loss of staff) that could affect performance. They are periodic meeting is not intended to include reviews of any licensing, inspection, or incident files. Review of some documents, however, may be useful during the meetings to clarify points made in discussions (for example e.g., summary printouts of inspection information, close-out letters in incident files, status of regulations, etc.).

As appropriate, topic areas for the scope of discussions during the meeting should include the following (but not limited to):

1. Status of the State's actions to address on all previous open IMPEP review findings and/or open recommendations that have not been recommended for closure at a previous periodic meeting.
2. Strengths and/or weaknesses of the State program as identified by the State or the NRC including identification of actions that could diminish weaknesses.
3. Feedback on the NRC's program as identified by the State and including identification of any action that should be considered by the NRC.
4. Status of the State Program, or policy changes under development or recently completed including:
  - a. Changes in program sStaffing and training:
    - i) Number of staff in the program and status of their training and qualifications;
    - ii) Program vacancies;
    - iii) Staff turnover;
    - iv) Adequacy of FTEs for the materials program.
  - b. Materials Inspection Program:
    - i) Discuss the status of the inspection program including whether an inspection backlog exists and the steps being taken to work off backlog.



- c. Regulations and Legislative changes:
    - i) Discuss status of State's regulations and actions to keep regulations up to date, including the use of legally binding requirements.
  - d. Program reorganizations:
    - i) Discuss any changes in program organization including program/staff relocations and new appointments.
  - e. Changes in Program budget/funding.
  - f. ~~Redistribution of responsibilities~~ For States whose Agreement became effective after August 26, 1999 determine the status of Site Decommissioning Management Plan (SDMP) sites transferred to the State. [Note that the Commission has asked that ~~the State should~~ notify the NRC when the license has been terminated and ~~whether~~ the site ~~was~~ has been released for unrestricted use as defined by the Agreement State].
5. ~~Status of NRC program changes (similar to those in 4) that could impact Agreement States. Event Reporting, including follow-up and closure information in NMED.~~
6. ~~Results of any internal program audits/self assessments conducted by the State. Response to Incidents and Allegations:~~
- a. Status of allegations and concerns referred by the NRC for action;
  - b. Significant events and generic implications.
7. ~~Status of all allegations and concerns previously referred by NRC to the Agreement State Radiation Control Program for action, and methods used to resolve allegations that have been closed. Status of the following Program areas (include if applicable):~~
- a. Sealed Source & Device Evaluation Program;
  - b. Uranium Recovery Program;
  - c. Low-Level Waste Disposal Program.
8. ~~Compatibility of Agreement State regulations~~ Information exchange and discussion:

- a. Current State initiatives;
  - b. Emerging technologies;
  - c. Large, complicated or unusual authorizations for use of radioactive materials, including:
    - i) Panoramic/Pool/Underwater Irradiators;
    - ii) Major decommissioning and license termination actions;
    - iii) Waste processing, storage and disposal licenses;
    - iv) Others.
  - d. State's mechanisms to evaluate performance (as applicable):
    - i) Self audits;
    - ii) Computer tracking;
    - iii) Inspector accompaniments;
    - iv) Other management tools.
  - e. NRC current initiatives.
9. ~~NMED reporting including event follow-up and closure information.~~
10. ~~For States whose Agreement became effective after August 26, 1999, determine the status of Site Decommissioning Management Plan (SDMP) sites transferred to the State. The State should notify NRC when the license has been terminated and whether the site was released for unrestricted use as defined by the Agreement State.~~
- 11.9 Schedule for the next IMPEP review.
10. Action items resulting from the periodic meeting (these should be documented in the meeting summary report). [Note: the meeting should not be used by the States to refer major policy issues to the NRC since these are addressed through other mechanisms].
11. Other topics.
- ~~C. During the course of the meeting discussions, all of the common and applicable non-common performance indicators should be addressed to determine if any of the actions detailed in V.I., below are necessary.~~

- DC. For open IMPEP review findings that the RSAO and ASPO conclude have been resolved, a recommendation for closure should be included in the meeting summary letter report. Formal closure will be completed only at the time of the next IMPEP review. Chronic problems should not be recommended for closure until sufficient time has passed to demonstrate that the problems are properly addressed.
- ED. ~~The single exception is the~~ The RSAO and ASPO shall review of all allegations and concerns referred to the State by the NRC in which the alleged's identity has been withheld. In addition, any performance concerns referred to the State should be discussed. It is not necessary to perform an in-depth review on performance concerns closed through STP Procedure SA-400, "Management of Allegations." The RSAO and ASPO must assure that appropriate follow-up is taken (e.g., that the State has addressed allegations in accordance with State procedures). ~~The meeting lead should discuss and review these allegations and concerns in depth.~~
- FE. During the meeting, NRC representatives should request introductions to new staff or to staff that they have not met previously.
- G. ~~As time permits, open idea exchanges between NRC and Agreement State staff not in attendance at the meeting is encouraged.~~
- HF. The meeting lead should informally share, prior to its final issuance, a draft summary report with the Agreement State Program Director, the ASPO and any other NRC staff attending the meeting for review and comment. The meeting lead should ~~dispatch~~ issue and distribute the ~~a concise~~ final summary letter of the meeting to the RCPD ~~Agreement State Radiation Control Program Director~~ within thirty (30) days and provide a copy to the Deputy Director, ~~OSP STP~~, the senior IMPEP pProject mManager, STP Periodic Meetings Coordinator, appropriate Regional management, and the ASPO, ~~for IMPEP coordination~~. The letter should include a list of meeting attendees, a brief synopsis of what was discussed during the meeting, a description of the status of all open recommendations and suggestions, and a summary identifying any key facts or changes, both positive and negative, from the meeting which could affect the focus and timing of future IMPEP reviews or program implementation.

No specific information about the allegations or concerns discussed at the meeting that could identify an alleged should be contained in the letter. The letter should state only the number of allegations and concerns discussed and whether ~~or not~~ the casework has been handled adequately. (If an Agreement State is not handling allegations or concerns in a manner consistent with the guidance provided in Management Directive 8.8, *Management of Allegations*, the RSAO and ASPO should report this fact separately to ~~OSP STP~~ management. ~~That is, the~~

Agreement State should have investigated the allegations and concerns, documented the results, and provided confidentiality in accordance with the Agreement State's statutes, rules, and procedures).

The State should be requested to provide additional comments if they believe that the letter content does not accurately reflect the meeting discussions. A sample letter is attached as Appendix B.

IG. If programmatic or performance concerns about an Agreement State program are raised identified during the meeting:

1. The concerns should be documented in the meeting summary report and presented to the MRB as part of the discussion of the periodic meeting results.
2. If the concerns have the potential to immediately affect public health and safety, the RSAO and ASPO should immediately inform OSP STP management, the IMPEP Project Manager and Regional management, and about the findings and discuss and propose recommend a course of action. STP management should notify the MRB Chair about the concerns identified and proposed course of action (a special MRB meeting may be convened to discuss the concerns and proposed course of action).
23. The MRB will decide on the appropriate course of action. OSP and regional management along with the RSAO and ASPO will agree on a course of action. Possible actions include altering the schedule for the next IMPEP review or scheduling an additional periodic meeting of with the specific State, conducting a special review of selected program areas, or setting up additional correspondence further or meetings with the State or placing the State on monitoring status.
34. Once a formal course of action has been decided, within 3 weeks an additional letter signed by the Director, OSP STP, should be sent to the Agreement State Radiation Control Program Director RCPD along with the meeting summary letter. The letter should include an explanation of the specific course of action decided upon by the MRB OSP management, the RSAO, and the ASPO, as well as a detailed summary of the reasons behind supporting the decision. A copy of the letter should be sent to all MRB members and appropriate Regional management. A sample letter is attached as Appendix C.

## **VI. APPENDICES**

- Appendix A - Sample meeting confirmation letter to Agreement State Radiation Control Program Director
- Appendix B - Sample meeting summary letter to Agreement State Radiation Control Program Director
- Appendix C - Sample “course of action” letter to from STP Director to Agreement State Radiation Control Program Director

## **VII. REFERENCES**

1. SECY-96-234, *Status Report on Implementation of the Integrated Materials Performance Evaluation Program (IMPEP)*
2. NRC Management Directive 8.8, *Management of Allegations*
3. STP Procedure SA-106, *The Management Review Board*
4. NRC Management Directive 5.6, *Integrated Materials Performance Evaluation Program (IMPEP)*
5. STP Procedure SA-400, *Management of Allegations*

# Appendix A

## SAMPLE MEETING CONFIRMATION LETTER TO AGREEMENT STATE RADIATION CONTROL PROGRAM DIRECTOR

Dear [Agreement State Program Director]:

In order to help both Agreement States and the U.S. Nuclear Regulatory Commission (NRC) remain knowledgeable of each others' programs and to conduct planning for the next Integrated Materials Performance Evaluation Program (IMPEP) review, the IMPEP process includes holding one-day periodic meetings with Agreement States between IMPEP reviews.

In accordance with OSP the Office of State and Tribal Programs (STP) Procedure SA-116, we request a meeting, no longer than one day, to discuss your Agreement State pProgram and share programmatic information. This letter confirms that, after previous coordination, the meeting is scheduled for [date] and will be held in your offices. In addition to myself, [ASPO], Office of State and Tribal Programs, assigned as Project Officer for [State], ~~identify any other NRC staff~~ will be the other NRC representative in attendance. [identify any other NRC staff that may attend].

Based on our previous discussions the likely topics for conversation discussion at the meeting include [add or delete topics, as appropriate, based on agenda planning discussions with the State]:

1. Status of State's actions to address ~~on~~ all open previous IMPEP review findings and/or open recommendations ~~that have not been recommended for closure at a previous periodic meeting.~~
2. Strengths and/or weaknesses of the State program as identified by the State or NRC including identification of actions that could diminish weaknesses.
3. Feedback on NRC's program as identified by the State and including identification of any action that should be considered by NRC.
4. Status of State Program ~~or policy changes under development or recently completed~~ including:
  - a. Changes in program sStaffing and training:
    - i) Number of staff in the program and status of their training and qualifications;
    - ii) Program vacancies;
    - iii) Staff turnover;
    - iv) Adequacy of FTEs for the materials program.

## Appendix A (Continued)

- b. Materials Inspection Program:
    - i) Discuss the status of the inspection program including if an inspection backlog exists and the steps being taken to work off backlog.
  - c. Regulations and Legislative changes:
    - i) Discuss status of State's regulations and actions to keep regulations up to date, including the use of legally binding requirements.
  - d. Program reorganizations:
    - i) Discuss any changes in program organization including program/staff relocations and new appointments.
  - e. Changes in Program budget/funding.
  - f. ~~Redistribution of responsibilities~~ For States whose Agreement became effective after August 26, 1999, determine the status of Site Decommissioning Management Plan (SDMP) sites transferred to the State. The State should notify NRC when the license has been terminated and whether the site was released for unrestricted use as defined by the Agreement State.
5. ~~Status of NRC program changes (similar to those in 4) that could impact Agreement States.~~ Event Reporting, including follow-up and closure information in NMED.
6. ~~Results of any internal program audits/self assessments conducted by the State.~~ Response to Incidents and Allegations:
  - a. Status of allegations and concerns referred by the NRC for action;
  - b. Significant events and generic implications.
7. Status of all allegations and concerns previously referred by NRC to the Agreement State Radiation Control Program for action, and ~~methods used to resolve allegations that have been closed.~~ Status of the following Program areas (include if applicable):
  - a. Sealed Source & Device Evaluation Program;

## Appendix A (Continued)

- b. Uranium Recovery Program;
  - c. Low-Level Waste Disposal Program;
8. ~~Compatibility of Agreement State regulations~~ Information exchange and discussion:
- a. Current State initiatives;
  - b. Emerging technologies;
  - c. Large, complicated or unusual authorizations for use of radioactive materials, including:
    - i) Panoramic/Pool/Underwater Irradiators;
    - ii) Major decommissioning and license termination actions;
    - iii) Waste processing, storage and disposal licenses;
    - iv) Others.
  - d. State's mechanisms to evaluate performance (as applicable):
    - i) Self audits;
    - ii) Computer tracking;
    - iii) Inspector accompaniments;
    - iv) Other management tools.
  - e. NRC current initiatives.
9. ~~NMED reporting including event follow-up and closure information:~~
10. ~~For States whose Agreement became effective after August 26, 1999, determine the status of Site Decommissioning Management Plan (SDMP) sites transferred to the State. The State should notify NRC when the license has been terminated and whether the site was released for unrestricted use as defined by the Agreement State.~~
9. Schedule for the next IMPEP review.
10. Other.

~~If there are any additional specific topics you would like to cover, or if you would like to focus on a specific area, please let me know.~~

If you have any questions, please call me at [RSAO phone number], or e-mail to [RSAO e-mail address].



## Appendix A (Continued)

Sincerely,

[RSAO]

cc: [SLO]  
[DDSTP]  
[IPM]  
[PMC]  
[Regional Manager]  
[ASPO]

## Appendix B

### SAMPLE MEETING SUMMARY LETTER TO AGREEMENT STATE RADIATION CONTROL PROGRAM DIRECTOR

Dear [Radiation Control Program Director]:

A periodic meeting with [State] was held on [date]. The purpose of this meeting was to review and discuss the status of [State's] Agreement State program. The NRC was represented by [ASPO and/or other OSP STP staff] from the NRC's Office of State and Tribal Programs, [any additional NRC staff in attendance including Regional staff] and me. Specific topics and issues of importance discussed at the meeting included [list a few topics discussed at the meeting that were particularly noteworthy].

I have completed and enclosed a general meeting summary, including any specific actions ~~that will be taken as a result of the meeting.~~ resulting from the discussions.

If you feel that our conclusions do not accurately summarize the meeting discussion, or have any additional remarks about the meeting in general, please contact me [RSAO phone number], or e-mail to [RSAO e-mail address] to discuss your concerns.

Sincerely,

[RSAO]

Enclosure:  
As stated

cc: [SLO]  
[DDSTP]  
[Regional Manager]  
[IPM]  
[PMC]  
[ASPO]

## Appendix B (Continued)

### AGREEMENT STATE PERIODIC MEETING SUMMARY FOR [STATE]

DATE OF MEETING: [DATE]

ATTENDEES: NRC STATE  
[RSAO]  
[ASPO]  
[OTHER]

#### DISCUSSION:

The proposed status for each of the recommendations and suggestions in Section 5.0 of the [year of last IMPEP review] [State] final IMPEP report is summarized below (number corresponding to those in the final IMPEP report). A copy of Section 5.0 of the IMPEP report is attached for reference.

[List the proposed status for each recommendation and suggestion made at the most recent IMPEP review including any recommendations for closure]

Other topics covered at the meeting included [... List any main all meeting's discussion topics of importance other than the recommendations and suggestions listed above].

1. Status of State's actions to address all open previous IMPEP review findings and/or open recommendations.
2. Strengths and/or weaknesses of the State program as identified by the State or NRC including identification of actions that could diminish weaknesses.
3. Feedback on NRC's program as identified by the State and including identification of any action that should be considered by NRC.
4. Status of State Program including:
  - a. Staffing and Training;
  - b. Materials Inspection Program;
  - c. Regulations and Legislative changes;
  - d. Program reorganizations;
  - e. Changes in Program budget/funding;
  - f. For States whose Agreement became effective after August 26, 1999, determine the status of Site Decommissioning Management Plan (SDMP) sites transferred to the State.

## Appendix B (Continued)

[Note that the Commission has asked that the State notify the NRC when the license has been terminated and when the site has been released for unrestricted use as defined by the Agreement State].

5. Event Reporting, including follow-up and closure information in NMED.
6. Response to Incidents and Allegations.
  - a. Status of allegations and concerns referred by the NRC for action;
  - b. Significant events and generic implications.
7. Status of the following Program areas:
  - a. Sealed Source & Device Program;
  - b. Uranium Mills Program;
  - c. Low-Level Waste Program.
8. Information exchange and discussion:
  - a. Current State initiatives;
  - b. Emerging technologies;
  - c. Large, complicated or unusual authorizations for use of radioactive materials, including:
    - i) Panoramic/Pool/Underwater Irradiators;
    - ii) Major decommissioning and license termination actions;
    - iii) Waste processing, storage and disposal licenses;
    - iv) Others.
  - d. State's mechanisms to evaluate performance (as applicable):
    - i) Self audits;
    - ii) Computer tracking;
    - iii) Inspector accompaniments;
    - iv) Other management tools.
  - e. NRC current initiatives.
9. Schedule for the next IMPEP review.
10. Action items resulting from the periodic meeting.

## Appendix B (Continued)

### 11. Other topics.

#### CONCLUSIONS:

Conclusion #1: [conclusion as applicable]

Action #1: [as applicable]

Conclusion #2: [conclusion as applicable]

Action #2: [as applicable]

Conclusion #3: [conclusion as applicable]

Action #3: [as applicable]

# Appendix C

## SAMPLE FORMAL "COURSE OF ACTION" LETTER TO AGREEMENT STATE RADIATION CONTROL PROGRAM DIRECTOR

Dear [Radiation Control Program Director]:

This letter is to inform you that (potential performance/performance) concerns about your program have been identified in your radiation control program due to based on the results of discussions at the [date of meeting] periodic meeting with [State] held with your Program. The periodic meetings were created to help NRC and Agreement States all parties involved remain knowledgeable of their respective programs an Agreement State's radiation control program and to conduct planning for the next IMPEP review. In the case that concerns are identified due to during discussions at a the periodic meeting The concerns about your program include:

[list in detail each individual concern about the program]

Due to these concerns, the NRC has decided to [give a detailed description of what action will be taken]; the Management Review Board (MRB) has directed that , the Office of State Programs can decide to alter [the schedule for the State's next periodic meeting or IMPEP review will be altered/conduct a special review of selected program areas will be conducted/or set up additional correspondence or meetings with the State will be held/the program will be placed on monitoring status].

We ask that you respond to this letter in writing within 30 days and identify those actions you will complete to address these concerns. If you have any questions, please contact [RSAO], RSAO of Region [region], or me.

Sincerely,

[Director, Office of State and Tribal Programs]

cc: [MRB Members]  
[RSAO]  
[Regional Manager]  
[IPM]  
[SLO]  
[ASPO]