STP Procedure Approval

The Management Review Board

SA-106

Issue Date:

Review Date:

Paul H. Lohaus
Director, STP

Original signed by:
Paul H. Lohaus

Date: / /2005

Dennis K. Rathbun
Deputy Director, STP

Original signed by:

Date: / /2005

Original signed by:

Procedure Contact, STP:

Date: / /2005

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. ~~Copies of STP procedures will be distributed for information~~.

I. INTRODUCTION

Per Management Directive 5.6, Integrated Materials Performance Evaluation Program (IMPEP), it is the policy of the U.S. Nuclear Regulatory Commission (NRC) to evaluate NRC Regional materials programs and Agreement State radiation control programs in an integrated manner, using common and non-common performance indicators, to ensure that public health and safety are adequately protected and that Agreement State programs are compatible with NRC's program. The Management Review Board (MRB) provides a senior-level review of the IMPEP team's findings and recommendations and issues the final NRC findings to the Region or Agreement State. For Agreement States, these findings can include decisions regarding heightened oversight, probation, suspension, or the revocation of some or all aspects of the regulatory program discontinued by the NRC and assumed by the Agreement State.

II. OBJECTIVES

1. To provide the guidelines that will be followed by the MRB when conducting MRB meetings for IMPEP reviews and issuing findings for Regional and Agreement State programs.

2. To establish the means to keep the MRB and the Commission informed on the status of Regional and Agreement State materials programs in a timely fashion.

3. To specify directions for documenting precedents established by the MRB.

4. To provide guidance to the MRB for their issuance of "letters of support" to Agreement States.

III. BACKGROUND

A. The MRB makes the overall assessment of each NRC Region or Agreement State program on the basis of the proposed final report and recommendations prepared by the IMPEP team that conducted the review of that Region or State, including any unique circumstances.

B. The overall MRB assessment includes a consideration of information provided by the Region or State at the MRB meeting, including concerns such as program decline, inability to replace staff, or inadequate resources for ensuring program's good performance.

C. The MRB may also convene to evaluate special reviews of a Region or an Agreement State Program conducted to assess a specific program weakness, to consider the results of periodic meetings with Agreement States, or to discuss any other relevant issues, such as the results of conference calls with States under heightened oversight or monitoring.

D. The MRB may direct the issuance of a "letter of support" be sent to an Agreement State:

1. to bring early indication of program performance decline to senior State management's attention identified through a periodic meeting, IMPEP review or routine "day -to-day" interactions with NRC staff. Day-to-day interactions with States (i.e., telephone calls, informal conversations at meeting, e-mail exchanges) may reveal concerns about changes in State organization, loss of staff, hiring freezes or other issues having a potential adverse effect on program reviews;

2. to recognize the contributions of a good program and express appreciation for the Program's contribution in ensuring protection of public health and safety; or

3. to congratulate a State during special occasions, such as achieving a milestone or celebrating the anniversary of the Agreement signing.

IV. ROLES AND RESPONSIBILITIES

~~A. The MRB is responsible for establishing the adequacy of Agreement State Programs and NRC Regions, as well as the compatibility of Agreement State Programs. In addition, they can set precedents and decide upon significant changes to the IMPEP process. Its membership consists of senior NRC managers, or their designees, to include: 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); General Counsel; and an Agreement State Liaison to the MRB. A quorum for an MRB meeting consists of at least three voting members of the MRB. Designees count as part of the quorum.~~

A. MRB

1. The MRB is responsible for:

   a. establishing the adequacy of Agreement State Programs and NRC Regions.

   b. establishing the compatibility of Agreement State Programs.

   c. establishing precedents and significant changes to the IMPEP process.

B. Deputy Executive Director for Materials, Research and State Programs (DEDMRS)

The DEDMRS or DEDMRS's designee, is the Chair of the MRB. The Chair has signature authority for outgoing correspondence resulting from MRB proceedings.

C. Office of State and Tribal Programs (STP)

STP is the lead office responsible for the coordination of MRB meetings At least seven days in advance of the meeting, the STP IMPEP project manager is responsible for providing all relevant correspondence for Agreement State Programs (i.e., State responses, proposed final reports, meeting agendas) to the MRB, the IMPEP team, and other attendees. (See Appendix A for sample memorandum transmitting the proposed report to the MRB and meeting agenda).

D. ~~Specific NMSS responsibilities are described in Part V. Guidance, C.~~ Office of Nuclear Material Safety and Safeguards (NMSS)

At least seven days in advance of the meeting, the NMSS IMPEP project manager is responsible for providing all relevant correspondence for NRC Regional Programs (i.e., Regional, proposed final reports, meeting agendas) to the MRB, the IMPEP team, and other attendees.

E. Organization of Agreement States (OAS)

OAS is responsible for specifying a representative to serve as a member of each MRB, as a non-voting Agreement State Liaison. In this capacity, the State representative receives applicable documentation and engages in all MRB discussions. The Agreement State Liaison representative is expected to provide an Agreement State perspective on any matter that is discussed or voted on by the MRB. The MRB may request an additional OAS Liaison with specific expertise or experience to participate in a particular MRB meeting if an additional State perspective is desirable.

F. Other NRC Offices

A representative from a fifth NRC office may participate as an MRB member if a concern exists with regard to a specific aspect of an NRC Region or Agreement State program. The lead office for the review will be responsible for inviting the representative. Representatives will be non-voting MRB members and may be taken from the following offices as needed:

1. The Office of Nuclear Safety and Incident Response (NSIR), lead office for NRC coordination of incident response issues.

2. The Office of Human Resources (HR), lead office for staffing and training issues.

V. GUIDANCE

A. MRB

1. MRB meetings are to be conducted approximately 74 days from the last day of the IMPEP review in order to issue the final report within 104 days. Although these meetings are exempt from the "Commission Policy Statement on Staff Meetings Open to the Public," the public is invited to observe each meeting. Each meeting will be published in the weekly notice of "NRC Meetings Open to the Public." MRB meetings may take place beyond the 74th day in order to assemble a quorum to accommodate Agreement State/Regional schedules, and/or to incorporate important supplemental material. However, every effort should be made by STP and NMSS to meet the timeliness goal for issuing the final reports in 104 days.

2. The MRB membership consists of senior NRC managers, or their designees, representing the DEDMRS; the offices of Nuclear Material Safety and Safeguards (NMSS); State and Tribal Programs (STP); General Counsel; and an Agreement State Liaison to the MRB. A quorum for an MRB meeting consists of at least three voting members of the MRB. Designees count as part of the quorum.

~~2~~ 3. The MRB Chair consults with other MRB members to reach a consensus position on each indicator and, if necessary, provides specific instructions to the IMPEP team leader. If a consensus is not apparent, a vote is taken and a simple majority decides the MRB's position about report revisions.

~~3~~ 4. In some instances, the overall program adequacy finding and, for Agreement States, the compatibility finding, may not be possible at the time of the MRB meeting. In those cases, a report is issued to the Region or Agreement State within the goal of 104 days that addresses both completed review findings and the status of outstanding issues. A report supplement will be issued when the outstanding areas are resolved by the MRB.

~~4~~5. The MRB may choose to go into an executive session during the public meeting at the discretion of the MRB Chair. For all matters that require a formal vote by the MRB, the vote will take place during the public meeting, regardless of whether the topic was discussed in an executive session or not.

6. The MRB may direct the NRC to issue a “letter of support”, upon receipt of a request from a State Program Director. In such a case, the State Program Director may view that their program is experiencing decline, unable to replace staff, or believes NRC’s support is needed to help the program to effectively compete for Department resources. A State submitted request, will be considered for a “letter of support” provided:

   a. the request is submitted to the MRB in writing.

   b. the purpose of the request for “ letter of support” is clearly identified.

c. the request contains a detailed description of the program performance issues, including an assessment of the performance indicator(s), that the State Program Director considers will result in less than a satisfactory rating if the IMPEP criteria are applied.

d. the request contains a "Staff Needs Analysis", performed as described in SA-700, "*Processing an Agreement*" where staffing issues are addressed.

e. the request includes a description of the efforts made by the program to address the performance issues.

8. The MRB will consider the request at its next regularly scheduled meeting, or sooner, if warranted. The State Program Director should be available to discuss the request with the MRB during the meeting.

9. The MRB will determine if a "letter of support" (see sample letter, Appendix B) is warranted based on the following criteria:

a. the performance issues are significant enough to warrant either heightened oversight or monitoring as stated in SA-122, *"Heightened Oversight and Monitoring;"*

b. the root cause of issues in performance areas needing improvement are budget and staffing issues which may need senior level management attention; or

c. one or more performance indicators have the potential to result in an unsatisfactory rating if the IMPEP criteria are applied.

10. If a State has been found satisfactory for all performance indicators during two consecutive IMPEP reviews, the letter for transmitting the final IMPEP review will include language such as commending the State for consistently meeting the standards of performance in all program areas or for the State's continued support in protecting public health and safety (see sample letter, Appendix C). The MRB will issue such letters to recognize a program's good performance and express appreciation for their contribution to ensure protection of public health and safety.

11. The MRB may also issue a letter of support to congratulate a State during special occasions such as achieving a milestone or celebrating the anniversary of the Agreement signing (see sample letter, Appendix D).

~~5~~12. If the MRB recommends that an Agreement State be placed on heightened oversight, the guidance in STP Procedure *SA-122, Heightened Oversight and Monitoring*, should be followed.

~~6~~13. If a finding of "Adequate, But Needs Improvement" is made of a Region, the MRB (including the Director, NMSS) will consult with the Executive Director for Operations to determine what remedial steps need to be taken and will inform the Commission accordingly. Program probation, suspension, and termination which will be considered when an "Adequate, But Needs Improvement" finding is made for an Agreement State Program are not applicable to Regional programs. NRC must implement immediate action to correct Regional program deficiencies that are similar to those that would warrant probation, suspension, or termination actions for an Agreement State.

~~7~~14. If the MRB recommends that NRC initiate proceedings to place an Agreement State program on probation, STP Procedure SA-113, *Placing an Agreement State on Probation*, should be followed.

~~8~~15. If the MRB recommends that NRC initiate proceedings to suspend an Agreement State program, STP Procedure SA-114, *Suspension of a Section 274b Agreement*, should be followed.

~~9~~16. If the MRB recommends that NRC initiate proceedings to terminate an Agreement State program, STP Procedure SA-115, *Termination of a Section 274b Agreement*, should be followed.

B. STP

1. For both Regional and Agreement State MRB meetings, the STP lead secretary ensures that MRB meetings are announced using Form 549, "Public Meeting Announcement Data Input" and are open to the public.

2. ~~For Agreement State MRB meetings t~~The STP IMPEP project manager is responsible for providing all relevant correspondence for Agreement State Programs (i.e., State responses, proposed final reports, meeting agendas) to the MRB, the IMPEP team, and other attendees, at least seven days in advance of the meeting, ~~as described in Appendix B.~~

3. The STP lead secretary in consultation with the IMPEP team leader, coordinates attendance at the MRB meeting with the representatives of the Agreement State or Region under review, the IMPEP review team members, and an Agreement State Liaison including invitational travel for attendance at the meeting. Attendance by Agreement State and NRC Regional participants through a video conference is encouraged whenever possible. If the State or Regional representative(s) will not be physically attending the meeting, arrangements for video conference or teleconference should be made by the STP lead secretary.

4. It is the duty of the STP IMPEP project manager to ~~keep the MRB informed on the status~~ coordinate regularly scheduled MRB meetings and inform the MRB on the results of periodic meetings and other issues associated ~~with the in a timely fashion through briefings of periodic meeting summaries~~. Project Manager assignments are described in section IV.C. of this procedure, STP Procedure SA-116, *Periodic Meetings with Agreement States* and NMSS Policy and Procedures Letter 1-70. ~~(A brief summary of each Region's and State's periodic meeting report will be given to the MRB at the most convenient MRB meeting following the issuance of the periodic meeting report~~. Management from each program discussed should be invited to participate in the meeting.

5. The STP IMPEP project manager, or designee, is responsible for taking and issuing minutes of Agreement State and Regional MRB meetings. The minutes should summarize major discussions, but not include verbatim accounts of the proceedings. Root causes for significant program performance issues, any precedents established by the MRB or lessons learned during the review that will be applied to the IMPEP process in the future, and any good practices should also be clearly documented. Preparation and dissemination

of meeting minutes are the responsibility of STP, unless otherwise stated. ~~Minutes of the preceding meeting are approved by the MRB in its next meeting or through mail. Following MRB approval, the minutes become a matter of the public record.~~

6. STP ~~will issue~~ is responsible for the preparation of an annual memorandum to the Commission featuring a report on the status of Agreement States' and Regions' radioactive material programs. The memorandum should include the following attachments: (1) Summary of Agreement States' Adequacy and Compatibility Status as of January of the year issued; (2) Summary of the NRC Regions' Adequacy Status; (3) Summary of IMPEP Report Issuance Against the 104-day Goal; and (4) Summary of Activities Related to States in Heightened Oversight or Increased Monitoring A sample memorandum with attachments can be found in Appendix ~~A~~ E.

VI. APPENDICES

Appendix ~~B~~A- Memorandum to the Management Review Board on the MRB Meeting and Sample MRB Meeting Agenda

Appendix B - Sample Letter for Expressing NRC's Concerns on Potential Decline in Program's Performance and Provide Assistance in Addressing Program Issues And Improve Performance Resulting from MRB's Consideration of a Periodic Meeting Report

Appendix C - Sample Letter to Recognize Program's Good Performance and Express Appreciation for Program's Contribution in Ensuring Protection of Public Health and Safety

Appendix D- Sample Letter to Congratulate a State During Special Occasions

Appendix ~~A~~E - Sample Annual Report on Status of Agreement States' and Regions' Radioactive Material Programs

VII. REFERENCES

1. NRC Management Directive 5.6, *Integrated Materials Performance Evaluation Program*.
2. STP Procedure SA-700, "*Processing an Agreement*"
3. STP Procedure SA-122, *Heightened Oversight and Monitoring*.
4. STP Procedure SA-113, *Placing an Agreement State on Probation*.
5. STP Procedure SA-114, *Suspension of a Section 274b Agreement*.
6. STP Procedure SA-115, *Termination of a Section 274b Agreement*.
7. NMSS Policy and Procedures Letter 1-70.
8. STP Procedure SA-116, *Periodic Meetings with Agreement States*.

Appendix ~~B~~A

DRAFT SAMPLE: Memorandum to the Management Review Board on the MRB Meeting and Sample MRB Meeting Agenda

MEMORANDUM TO: Deputy Executive Director for Materials, Research, and State Programs

Director, Office of State and Tribal Programs

Director, Office of Nuclear Material Safety and Safeguards

General Counsel

FROM: Deputy Director, Office of State and Tribal Programs [for Agreement State programs]

[OR]

Director
Division of Industrial and Medical Nuclear Safety
Office of Nuclear Material Safety and Safeguards [for NRC Regional programs]

SUBJECT: INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM (IMPEP) REVIEW OF [STATE/ REGION] RADIATION CONTROL PROGRAM

This memorandum transmits to the Management Review Board (MRB) a proposed final report (Attachment 1) documenting the IMPEP review of the [State/Region] Radiation Control Program. The review of the [State/Region] program was conducted by an interoffice team during the period [date]. The team issued a draft report to [State/Region] on [date], for factual comment. [State/Region] sent factual comments by [letter/memorandum] dated [date] from [Name], (Attachment to proposed final report).

The review team found [State's/Region's] performance with respect to each of the performance indicators to be [satisfactory, satisfactory with recommendations for improvement or unsatisfactory.] [Accordingly, the team recommends that the MRB find the {State's} program to be {adequate to protect public health and safety, adequate but needs improvement, or inadequate to protect public health and safety} and {compatible or not compatible} with NRC's program.]

OR

Appendix A (cont'd)

[Accordingly, the team recommends that the MRB find the {Region's} program to be {adequate to protect public health and safety, adequate, but needs improvement, or inadequate to protect public health and safety}.]

The MRB meeting to consider the [State/Region] report is scheduled for [day, date,] from [time] - [time] in [location]. In accordance with Management Directive 5.6, the meeting is open to the public. The agenda for that meeting is attached (Attachment 2).

If you have any questions prior to the meeting, please contact me at [phone number] or [IMPEP team leader] at [phone number].

Attachments:
As stated

cc: [State/Region representative]
Agreement State Liaison to MRB

Appendix A (cont'd)

Agenda for Management Review Board Meeting

[day, date, time, location]

1. Announcement of public meeting, request for members of the public to indicate they are participating and their affiliation.

~~1~~2. MRB Chair convenes meeting. Introduction of MRB members, review team members, [State/Regional] representatives, and other representatives participating through telephone bridge or video conferencing.

~~2~~3. Consideration of [State/Region] IMPEP Report.

A. Presentation of Findings Regarding [State/Region] Program and Discussion.
- Technical Staffing and Training
- Status of Materials Inspection Program
- Technical Quality of Inspections
- Technical Quality of Licensing Actions
- Response to Incidents and Allegations

[And the applicable following 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
- Site Decommissioning Management Plan

B. IMPEP Team Recommendations:
- Adequacy [and Compatibility] Rating
- Recommendation for the Next IMPEP Review

C. MRB Consultation/Comments on Issuance of Report

~~3. Results of Periodic Meetings~~

4. Request for Comments from [State/Region] Management, OAS Liaison and State IMPEP Team Member.

~~5. Precedents/Lessons Learned and Identification of Good Practices~~

6~~5~~. Adjournment.

Invitees:	DEDMRS	Team Leader
	Director, STP	RSAO
	Director, NMSS	Team Member
	General Counsel	Team Member
	OAS Liaison	Deputy Director, STP
	State/Regional Management	Other State/Regional Attendees
	IMPEP Project Manager	
	Other NRC Attendees	

APPENDIX B

SAMPLE LETTER FOR EXPRESSING NRC'S CONCERNS ON POTENTIAL DECLINE IN PROGRAM PERFORMANCE AND PROVIDE ASSISTANCE IN ADDRESSING PROGRAM ISSUES AND IMPROVE PERFORMANCE RESULTING FROM MRB'S CONSIDERATION OF A PERIODIC MEETING REPORT

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

Dear [NAME]:

I am writing to discuss the results of a Periodic Meeting held in your [Agency/]Department] on [DATE], with staff of the [Bureau of Radiation Control/Radiation Control Program/other]. Periodic Meetings are held to enable the U.S. Nuclear Regulatory Commission (NRC) and Agreement States to remain knowledgeable of their respective programs and to conduct planning for the next Integrated Materials Performance Evaluation Program (IMPEP) review. NRC has an oversight responsibility to periodically review Agreement State Programs for adequacy and compatibility with NRC's program and conducts these reviews under IMPEP.

NRC also uses the Periodic Meeting process to more effectively gather important performance information and increase focus on identifying performance issues earlier. This process includes an enhanced meeting coordination process; an earlier, more effective and active participation of the Management Review Board (MRB), a panel of NRC managers with an Agreement State manager liaison in the process; and active Radiation Control Program Director participation in the discussion of meeting results and decision making process.

The MRB met on [DATE], to discuss the results of the [STATE]'s [DATE], Periodic Meeting. Potential performance concerns identified in your radiation control program during the periodic meeting were discussed. I have enclosed a copy of the [DATE], letter to [Program Director], summarizing the results of the [DATE], Periodic Meeting. Highlights of the concerns identified during discussions are presented below.

The Program is experiencing difficulty in [DESCRIBE PROGRAM ISSUES]. Given these developments, we have concerns regarding the program's ability to maintain an adequate and compatible radiation safety program.

Your support in helping ensure that the [STATE] Agreement State Program has the necessary resources and support to continue to manage an effective program is crucial. I want to assure you that the Commission supports the objectives of the [STATE] Agreement State Program and that NRC staff will continue to work closely with your program. We thank you for your commitment to this effort.

Sincerely,

[NAME]
Deputy Executive Director
for Materials, Research and State Programs
Office of the Executive Director for Operations

Enclosures:
As stated

cc: [STATE LIAISON OFFICER]
[RADIATION CONTROL PROGRAM DIRECTOR]
[OTHER]

APPENDIX C

SAMPLE LETTER TO RECOGNIZE PROGRAM'S GOOD PERFORMANCE AND EXPRESS APPRECIATION FOR PROGRAM'S CONTRIBUTION ENSURING PROTECTION OF PUBLIC HEALTH AND SAFETY

[STATE OFFICIAL]
[ADDRESS]

Dear [STATE OFFICIAL]:

On [DATE] the Management Review Board (MRB) met to consider the most recent Integrated Materials Performance Evaluation Program (IMPEP) review of the [STATE] Agreement State Program. This review was conducted on [DATE].

Based on the discussions during the MRB meeting the [STATE] Agreement State Program resulted in a satisfactory finding for all performance indicators and an overall finding that the [STATE] Agreement State Program is adequate to protect public health and safety, and compatible with NRC's program. The [STATE] Agreement State Program performance is a credit to the talent, training, determination, and hard work of the Program staff and management.

On behalf of the NRC, I want to thank you for maintaining an outstanding radiation safety program and for your continued support of the important services that the [STATE RADIATION PROTECTION AGENCY/PROGRAM] provides for your State. That serves as an example for radiation control programs in other States and nations. Your continued support of the [STATE] Agreement State Program is critical to protect the public health and safety of the citizens of your State and the nation as a whole.

Sincerely,

[NAME]
Deputy Executive Director
for Materials, Research and State Programs
Office of the Executive Director for Operations

cc: [STATE LIAISON OFFICER]
[RADIATION CONTROL PROGRAM DIRECTOR]
[OTHER]

APPENDIX D

SAMPLE LETTER TO CONGRATULATE A STATE DURING SPECIAL OCCASIONS

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

Dear [NAME]:

On behalf of the U. S. Nuclear Regulatory Commission (NRC), I want to congratulate you and the State of [STATE] for [REASON].

I would like to take this opportunity to thank you and your State for the important services and hard work that the [STATE RADIATION PROTECTION AGENCY/PROGRAM] performs in support to the NRC's mission of regulating the use of radioactive materials for civilian purposes to ensure the protection of public health and safety and the environment.

Your continued efforts and support of the [STATE] Agreement State Program is critical to protect the public health and safety of the citizens of your State and the nation as a whole. I want to assure you that the Commission supports the objectives of the [STATE} Agreement State Program and looks forward to continue to work cooperatively with your program in the future.

Sincerely,

[NAME]
Deputy Executive Director
for Materials, Research and State Programs
Office of the Executive Director for Operations

cc: [STATE LIAISON OFFICER]
[RADIATION CONTROL PROGRAM DIRECTOR]
[OTHER]

Appendix ~~A~~E

MEMORANDUM TO: [The Chairman and Commissioners]

FROM: [Executive Director for Operations]

SUBJECT: ANNUAL REPORT OF AGREEMENT STATES' AND REGIONS' RADIOACTIVE MATERIAL PROGRAMS

This is an annual report on the status of the Agreement States' and Regions' radioactive material programs. Depending on the State's performance, review cycles under IMPEP are up to four years. All but [#] Agreement States were found to be adequate to protect public health and safety and were found to be compatible with the NRC's program. Attachment 1 is the Summary of Agreement States' Adequacy and Compatibility Status as of January [YEAR].

[Include brief discussions of any States/Regions that were in Heightened Oversight and/or Monitoring during the past fiscal year.]

Attachment 2 presents the Summary of the NRC Regions' Adequacy Status. Attachment 3 presents a summary of IMPEP report issuance against the 104-day goal. Attachment 4 presents a summary of activities related to States in heightened oversight or increased monitoring.

Attachments:
As stated

cc: SECY
OGC
OCA
OPA
CFO

Distribution:
EDO RF (WITS #)
DIR RF DCD (SP01) PDR (YES)
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SUMMARY OF AGREEMENT STATES' ADEQUACY AND COMPATIBILITY STATUS

JANUARY [YEAR]

STATE	REVIEW YEAR	ADEQUACY FINDING	COMPATIBILITY FINDING
[STATE]	[YEAR]	[adequate...]	[compatible ...]

SUMMARY OF NRC REGIONS' ADEQUACY STATUS

REGION	REVIEW YEAR	ADEQUACY FINDING
Region I	[YEAR]	[adequate...]
Region II	[YEAR]	[adequate...]
Region III	[YEAR]	[adequate...]
Region IV	[YEAR]	[adequate...]

IMPEP REPORT TRACKING

FY [YEAR]

State or Region	**Review Date Month/Year**	**Total number of days from review to release of final report Goal: 104 Days**
[STATE]	[DATE]	[#]

FY [YEAR] HEIGHTENED OVERSIGHT/MONITORING CHART

State	RSAO/ASPO	Last IMPEP Review	Last Contact	Next Contact	Action(s) Due
HEIGHTENED OVERSIGHT					
[STATE]	[RSAO/ASPO]	[DATES]	[CALL, REVIEW...]	[CALL, REVIEW...]	[LIST OF ACTIONS
INCREASED MONITORING					
[STATE]	[RSAO/ASPO]	[DATES]	[CALL, REVIEW...]	[CALL, REVIEW...]	[LIST OF ACTIONS