



UNITED STATES
NUCLEAR REGULATORY COMMISSION

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March 4, 2002

MEMORANDUM TO: IMPEP Lessons Learned Working Group Members:

Kathleen Schneider, Co-Chair, STP
William Silva, Co-Chair, TX
Charles Cox, NMSS
Terry Frazee, WA

FROM: Lance J. Rakovan, Health Physicist
Office of State and Tribal Programs

A handwritten signature in black ink, appearing to read "Lance J. Rakovan".

SUBJECT: MINUTES: SEPTEMBER 4-6, 2001 IMPEP LESSONS
LEARNED WORKING GROUP MEETING

Attached are the minutes from the Integrated Materials Performance Evaluation Program (IMPEP) Working Group meeting held September 4-6, 2001. Due to higher priority work assignments, the schedule as developed and discussed with the Steering Committee on September 6, 2001 was not met. We successfully presented our findings and solicited input from the Agreement States at the October 8-10, 2001 Organization of Agreement States Meeting and are planning to send the proposed final report to the Steering Committee for a two-week review and comment period by March 11, 2002. The final report would then be issued by April 1, 2002.

If you have comments or questions, please contact me at 415-2589.

Attachment:
As stated

cc: J. Lynch, RIII

**MINUTES: SEPTEMBER 4-6, 2001 IMPEP LESSONS LEARNED WORKING
GROUP MEETING**

The Working Group held its second public meeting from September 4-6, 2001, in Rockville, Maryland. The Working Group members attending were as follows:

Kathleen Schneider, Co-Chair, STP
Lance Rakovan, STP

William Silva, Co-Chair, TX
Charles Cox, NMSS

The following resource representative was present:
James Lynch, NRC RIII (Absent 9/4-5/01)

These minutes are presented in the same general order as the items were discussed in the meeting.

DAY ONE

The status of the Working Group findings was discussed as well as the Working Group report including proposed revisions from members of the Steering Committee. Potential weaknesses of the report were noted, as well as areas that needed to be supplemented in the report to better convey the processes used by the Working Group. It was decided that the report also needed information on the Integrated Materials Performance Evaluation Program (IMPEP) process in general.

The Working Group discussed the flexibility of the "Satisfactory with Recommendations for Improvement" rating and whether there is need for revision. The Working Group decided that the process is working as intended, and leaving the category broad as currently written is appropriate.

The Working Group went over the document "Directives Resulting from Management Review Board (MRB) Meetings" and discussed changes the MRB has made to IMPEP team findings to see if there were any patterns to MRB changes that should be addressed by this Working Group.

Paul Lohaus, Director, NRC Office of State and Tribal Programs (the lead organizations for the Working Group), stopped by and gave input on the structure and organization of the draft Working Group report. He suggested adding chapters to describe the Working Group's tasks and to convey the process used by the Working Group including the interviews conducted, analyses completed, etc., as well as a paragraph detailing how the report is organized and how the results are presented. He suggested presenting the recommendations in three general categories - big changes, enhancements, and future initiatives. He stressed the importance of the recommendations and how they are presented.

Mr. Lohaus noted that the IMPEP process is working well, has served both the States and NRC Regions well, is an evolving process, and that prompt action is taken when weaknesses are found. He noted the improvements in programs that have been on heightened oversight, that experience is reflected back into process and procedures, and that sharing and communication is continually aiding other programs in addition to the program being reviewed.

The Working Group found no basis or need for any major revision to the IMPEP process. The substantive changes discussed included the need to complete the non-common performance

indicator guidance and make the non-common criteria more performance-based, if possible. The need to expand IMPEP team member training to properly convey up-to-date information was also discussed. Team Leaders need a set of objectives and guidance to share with teams prior to a review including information on the IMPEP process, team member responsibilities, clear communication with program staff, and keeping findings performance-based. The need to strengthen the between-IMPEP interactions including the use of self-audits and better communication through Regional State Agreement Officers (RSAOs) and Agreement State Project Officers (ASPOs) was discussed.

The Working Group noted that there were approximately 22 reviews where recommendations were either changed to suggestions or eliminated by the MRB and approximately 7 reviews where indicator findings were changed by the MRB (each featuring a more positive rating).

The Working Group discussed the need for guidance involving IMPEP reviews of complex programs such as New York, South Carolina, and California. (i.e., programs with regional offices, with responsibilities split between two or more programs, etc.) It was decided that guidance in this area would supplement the IMPEP process, and thus a recommendation on this issue should be featured in the Working Group's report.

The Working Group discussed reorganizing the report to better convey both findings and background information in the following manner:

INTRODUCTION

- I. Tasks**
- II. Working Group Process**
- III. Conclusions of The Working Group**
- IV. Recommendations And Findings**

SUMMARY

APPENDICES

The Working Group reviewed the various resources examined and discussed at Working Group meetings: (1) MRB minutes from December 1995 - March 2001 including all changes to findings, recommendations, directions for performance-based recommendations, and guidance towards management of the IMPEP process; (2) interviews of current MRB members and the five current experienced Organization of Agreement States (OAS) Liaisons; (3) results of periodic meetings in comparison to the results of IMPEP reviews for Agreement States; (4) IMPEP reports to determine which Regions and Agreement States are completing some sort of self-audit; (5) survey responses received from 52 stakeholders including NRC and Agreement State staff and management; (6) existing procedures and guidance available for the IMPEP program; (7) the 1998 "Assessment of Quality and Effectiveness of the IMPEP Reports and Process" report; and (8) historical knowledge of Working Group members and resource representatives.

The Working Group discussed what information should be included in the "Conclusions" section of the report. The following topics were agreed upon by Working Group members:

- IMPEP is working well;
- It has served Agreement States and the NRC well;

- It has been effective in addressing areas where programs needed to take prompt action to address issues (i.e., New Mexico, Nebraska, Kansas, etc.);
- IMPEP is a dynamic and evolving program that reflects back experience to date;
 - Region reviews from 2-4 year interval
 - Moving towards performance-based reviews
- The process can be enhanced in many ways:
 - No need for revision to Management Directive 5.6 common performance indicator criteria.
- The Working Group identified three categories of enhancements: substantive changes, enhancements, and items for future consideration;
- Substantive changes (significant changes to policy or process):
 - Non-common performance indicators;
 - Periodic meeting changes including self-audits;
 - Expanding the scope of IMPEP to include all NRC programs similar to; Agreement State programs.
- Mention other styles of enhancements listed in report
 - Enhancements
 - Items for future consideration.

The Working Group discussed the inclusion of a self-audit as part of IMPEP or as part of periodic meetings. It was decided that an item for future consideration is to pursue self-audits as part of the process.

The Working Group discussed how the chapter of the report on Recommendations and Findings would be organized, either by task (as in the present draft) or by the three categories of recommendations. The Working Group decided to only revise that chapter of the report by indicating the recommendation category.

Reorganizing the survey results by subject matter was discussed by the Working Group. The benefit of this type of analysis was debated and the Working Group decided that this would better support and convey the Working Group's process. Mr. Cox volunteered to reorganize the responses in this manner. Ms. Schneider volunteered to write up the "Process" section and Mr. Rakovan agreed to put together the "Tasks" section as well as the "Conclusions" section. Mr. Silva volunteered to draft the Working Group's presentation for the Steering Committee.

DAY TWO

The Working Group discussed the various assignments completed by Working Group participants the previous evening including the reorganization of the survey results by topic.

The Working Group decided that IMPEP should continue to seek information technology (IT) efficiencies and effectiveness in general and to reduce the burden of the IMPEP questionnaire. The questionnaire should be covered at the IMPEP team member training.

The Working Group discussed the need for improvements in the STP regulation adoption process.

It was decided to expand the recommendation involving adding additional OAS Liaisons to the MRB to include NRC Regional management.

The Working Group discussed the number of comments involving the lack of time given to team members and team leaders to participate on an IMPEP review team. It was decided that a letter similar to the 1997 letter addressing this issue be sent to managers of IMPEP team members to ensure that all fully understand the commitment necessary to participate on an IMPEP team. The letter should be sent periodically (annual or biannual).

The importance of teams conducting a performance-based reviews was discussed.

The Working Group discussed preparations for the joint Working Group/Steering Committee Meeting to be held on Thursday, September 5, 2001. It was decided that Mr. Silva would begin the presentation by reviewing the Working Group's tasks, presenting the process and resources used by the Working Group, and the group's conclusions. Ms. Schneider would then present the group's recommendations including which category of improvement the various recommendations fall into: substantive changes, enhancements, or items for future consideration. It was decided that Mr. Silva should also give an overview of the format of the report in his segment of the presentation.

The Working Group discussed the recommendation involving the use of self-audits. It was decided to revise the recommendation to include that self-audits be part of the IMPEP/periodic meeting process. The self-audits would then be considered a substantive recommendation.

The Working Group discussed the policy currently being piloted to report the results of periodic meetings at MRB meetings to ensure the MRB has an understanding of the status of the national materials program. It was decided to include language in the report that the initial purpose of the periodic meetings was more of a exchange of information meeting, between States and the NRC on various program changes. However, after experiences with programs such as Tennessee, there appears to be a need for a more aggressive approach. The meetings should be used as a mark of program status to identify any deficiencies that have developed since the previous IMPEP review.

The Working Group discussed combining recommendations 3-2 and 3-3 in the report and changing recommendation 3-1 to 3-2. It was decided to revise the language involving Task #3 in the report to clarify the Working Group's position on the changes necessary for the periodic meetings. The new recommendation would be approximately as follows:

Recommendation 3-1: The Working Group recommends that substantial changes to the periodic meeting process be made to focus the meetings on becoming a more effective tool for determining continuing performance in the Agreement States. These changes should include:

- a. The use of self-audits with appropriate flexibility for the size of the program;
- b. In preparation for the periodic meetings, the State should be sent a copy of their questionnaire from the previous IMPEP review (possibly a simplified version) to update; and

- c. Continue to pilot the use of MRB meetings to provide updates on periodic meeting results to ensure that State and NRC management are informed of program issues outside of the IMPEP cycle.

A paragraph should also be added to the report discussing what the Regions are doing in terms of between-IMPEP interactions.

The Working Group discussed adding a recommendation to the report involving reexamining the possibility of allowing the OAS Liaison to be a full voting member. A new recommendation should be included in the report as follows:

Recommendation 5-3: The Working Group recommends that the issue of whether the Agreement State Liaison to the MRB could be a voting member be reconsidered if there are any changes in the legal basis due to changes in either FACA or from the implementation of recommendations of the National Materials Program Working Group.

The Working Group discussed incorporating IT issues into the IMPEP process. The Working Group decided to include a new recommendation in the report:

Recommendation 1-10: The Working Group recommends that NRC continue to seek out new ways to incorporate various information technology advances to make the IMPEP process more efficient and less of a burden on all parties involved.

The report should note the evolution of the database for regulations, (RATS system) and the present posting of the final review letters on the web.

Pilots were discussed by the Working Group including the following:

- Including Regional management as part of the MRB
- Having additional State team members on IMPEP teams
- Reporting results of periodic and orientation meetings at MRB meetings
- Continuing to conduct IMPEP-like reviews of NRC Headquarters' programs similar to the reviews conducted of the NRC SS&D program.

The Working Group went over the presentation prepared by Mr. Silva for the joint Working Group/Steering Committee Meeting. The few comments made were incorporated into the document.

DAY THREE

The Working Group discussed the presentation including what points needed to be highlighted and what questions should be expected.

It was decided that the third category of recommendations be renamed "items for future action" since it is expected that they will eventually be completed, not just considered for completion.

Mr. Lynch joined the meeting by teleconference. He noted that the RSAOs felt that the ASPO program was not much of a benefit. They noted that communications on all levels are not strong. The Working Group discussed the section of the report that covers RSAO/ASPO communications and the evolution of the ASPO program including responsibilities of various

parties.

Mr. Silva and Ms. Schneider went over their portions of the presentation and the Working Group members shared comments on content, sequence, and style.

The Working Group rated the substantive changes against the strategic goals as requested in the charter. The following ratings were agreed upon:

	Ranking	MS	PC	EER	RUB
Non-common: performance-based	1 (high)	high	medium	high	high
Non-common: guidance	3 (medium)	medium	low	high	medium
Periodic meetings	2 (high)	high	high	high	low
Expand scope	4 (low)	low	high	medium	low

The Working Group discussed the schedule and assignments to complete the Working Group report and presentation. It was agreed that an additional week or two would most likely be necessary to complete the final report as long as the presentation for the OAS meeting is ready on time.

The Working Group discussed potential weaknesses or deficiencies in the report as written. A summary section was noted as a necessity. It was also decided upon that the report would benefit from additional language to support the existing language and an appendix discussing the general history and evolution of the IMPEP process including details on project management. It was decided to include an additional appendix listing all of the recommendations individually by category. Assignments were given as follows:

Mr. Cox would revise the discussion of Task #2 and write the Summary section.

Ms. Schneider and Mr. Rakovan would add additional language to the Recommendations and Findings section as well as adding the appendix discussing IMPEP history and process.

The goal was established to send the report out to the Steering Committee by COB September 21, 2001, with the flexibility to take time for additional revisions in case there is disagreement between Working Group participants.

IMPEP Lessons Learned Working Group Members

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