SUMMARY OF COMMENTS ON SA-120, "Agreement State Participation as IMPEP Team Members"

I. Sent to the Agreement States for Comment: October 6, 2005 (STP-05-077)

Comments/Dated: Washington - 10/17/05 (e-mail)

North Carolina - 10/26/05 (telephone - no comments)

Illinois - 10/28/05 (e-mail - no comments)

Response to/Resolution of Comments:

Washington

Comment:

Page 2 of document, The Roles and Responsibilities, STP Director; We suggest that refresher training be offered for all potential team members about every two to three years. Training would be given unless that person had been involved in a IMPEP team inspection during that interval.

Response:

The frequency for IMPEP team member refresher training is defined in other procedures, namely Management Directives 5.6 and 5.10, and STP Procedure SA-111, "Implementation of Management Directive 5.10, Formal Qualifications for IMPEP Team Members." The changes to this document in regard to annual training are consistent with the new policy for refresher training described in a November 9, 2005 All Agreement States Letter (STP-05-080). In order to more accurately meet the needs of the IMPEP program, to reduce the cost associated with travel, and to limit the burden placed on Agreement States and NRC regional offices due to the loss of staff time to attend refresher training, the refresher training policy has been modified. IMPEP refresher training will be conducted concurrently with the new member training. Only IMPEP team members who are participating in an IMPEP review during the upcoming fiscal year, and who did not participate on an IMPEP review or attend IMPEP new member training in the previous fiscal year, will be required to attend refresher/new training. This change in policy will be incorporated into the affected procedures at their next revision. No changes will be made to this procedure based on this comment.

II. Sent to the NRC Offices for Comment: October 6, 2005

Comments/Dated: OGC - 10/21/05 (mark-up)

Region III - 10/21/05 (e-mail - editorial suggestions)

Region I - 10/25/05 (e-mail - no comments) Region IV - 10/25/05 (e-mail - no comments) NMSS - 10/27/05 (e-mail - no comments)

OGC

All comments were typographical or editorial and the procedure will be revised accordingly.

Region III

All comments were typographical or editorial and the procedure will be revised accordingly.