

December 19, 2006

SUMMARY OF COMMENTS ON IMPEP QUESTIONNAIRE

I. Sent to the Agreement States for Comment: August 8, 2006 (STP-06-070)

Comments/Dated: Washington - 8/28/06 (e-mail)

WASHINGTON

All comments pertained to numbering sequences and word choice. All comments were reflected in the final document.

II. Sent to the NRC Offices for Comment: August 8, 2006

Comments/Dated: Region I - 8/18/06 (e-mail)
Region IV - 9/4/06 (email - no comments)
NMSS - 9/5/06 (e-mail)
Region III - 9/18/06 (e-mail)

REGION I

Comment 1:

Section V.C.2.a. Routine IMPEP Reviews: Recommend that the first sentence be revised to read: "For Agreement States, the review team will consist of at least three members: Team Leader from another Region or STP, the Regional State Agreements Officer from the Region where the Agreement State is located and one Agreement State representative."

Response:

We agree with this comment and the procedure was revised accordingly with slight modification to reflect the reorganization of NMSS and STP.

Comment 2:

Section V.H. On-Site Review: The procedure should provide a discussion on the handling of differences between team members on determining a finding for the State/Region's performance in a particular indicator, including its documentation in the report.

Response:

We agree that conflict resolution and documentation is an important topic in the dynamics of IMPEP review teams; however, we do not believe that this procedure is the most appropriate place for a discussion on this topic. This procedure is intended to provide more of a broad view of the implementation of IMPEP. No changes to the procedure will be made as a result of this comment.

Comment 3:

Appendix A: The letter should specify a date that the questionnaire is due back to the team leader. This is typically 10 to 14 days prior to the start of the review.

Response:

The former Appendix A has been removed from the procedure. Former Appendix A can now be found on the IMPEP Toolbox. The letter was revised to reflect a due date for the questionnaire in response to this comment.

NMSS

Comment 1:

Section V.A.1.b. It may be appropriate to add “or at the discretion of the MRB” at the end of this subsection, if the interval between reviews can be shortened or lengthened at the discretion of the MRB without first having a recommendation from the team.

Response:

Section V.A.1.b. has been revised to read:

The interval between reviews of Agreement State and NRC Regional programs may be shortened or lengthened to another appropriate interval ~~based on recommendations at~~ **the direction** of the MRB, **based on the review team’s recommendation or other information presented during the MRB meeting;**

Comment 2:

Section V.A.4.b. This subsection is confusing as written. If appropriate, the following wording might be clearer: “A special review for an Agreement State or NRC Region may be scheduled upon request by NRC or ~~when requested by the Agreement State or NRC Region based on~~ **when the** NRC’s evaluation ~~of~~ indicates the need for such a review.”

Response:

Section V.A.4.b. has been revised to read:

A special ~~meeting~~ **review** for an **Agreement** State or NRC Region may be scheduled upon request by NRC or ~~when requested by the an Agreement State or Region based on~~ **when specific circumstances indicate** ~~NRC’s evaluation of~~ the need for such a ~~meeting~~ **review**.

General Comments:

Many comments were made regarding formatting and word usage. Most comments were incorporated into the final version of the procedure.

Region III

All comments pertained to numbering sequences and word choice. All comments were reflected in the final document.