

FSME Procedure Approval

Implementation of Management Directive 5.10, "Formal Qualifications for IMPEP Team Members"

SA-111

Issue Date: February 22, 2007

Review Date: February 22, 2010

Janet R. Schlueter Original signed by

Director, DMSSA Janet R. Schlueter Date: 2/22/2007

Scott W. Moore Original signed by

Deputy Director, DMSSA Scott W. Moore Date: 2/21/2007

Aaron T. McCraw Original signed by

Procedure Contact, DMSSA Aaron T. McCraw Date: 2/6/2007

ML071400006 Pkg.

NOTE

These procedures were formerly issued by the Office of State and Tribal Programs (STP). Any changes to the procedure will be the responsibility of the FSME Procedure Contact as of October 1, 2006. Copies of FSME procedures will be available through the NRC website.



Procedure Title: Implementation of Management

Directive 5.10

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I. INTRODUCTION

This document describes the procedure for implementing NRC Management Directive (MD) 5.10, "Formal Qualifications for Integrated Materials Performance Evaluation Program (IMPEP) Team Members."

II. OBJECTIVE

To implement the qualifications and training established in MD 5.10 within the Office of Federal and State Materials and Environmental Management Programs (FSME) through the use of a written qualification guide for FSME IMPEP team members and team leaders.

III. BACKGROUND

NRC conducts periodic assessments of NRC Regional and Agreement State radioactive materials programs pursuant to MD 5.6, "Integrated Materials Performance Evaluation Program." IMPEP teams are comprised of staff from FSME, NRC Regional offices, and Agreement States.

The training and qualification process detailed in MD 5.10 is intended to provide IMPEP team members and team leaders with sufficient knowledge to conduct NRC Regional and State radioactive materials program reviews in accordance with NRC policies and procedures. To facilitate implementation of this directive within FSME, an IMPEP Qualification Form and an IMPEP Qualification Guide have been prepared (see Appendix A and Appendix B, respectively).

IV. ROLES AND RESPONSIBILITIES

A. Director, FSME:

Signs, or designates responsibility for signing, the IMPEP Qualification Form for each FSME IMPEP participant.

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B. IMPEP Project Manager:

- 1. Maintains current copies of the IMPEP Qualification Form for all IMPEP team members;
- 2. Ensures that individuals assigned as IMPEP team members, including team leaders, meet the formal qualifications or alternate criteria, as described in MD 5.10; and,
- 3. Tracks each IMPEP-qualified individual's status and need for refresher training, per the policy for refresher training.

C. IMPEP Team Member:

- 1. Using the IMPEP Qualification Guide, documents relevant course work and experience, as well as alternative criteria, such as equivalency examinations, waivers, grandfathering, or interim qualification described in MD 5.10, as appropriate;
- 2. Prepares and signs the IMPEP Qualification Form;
- 3. Reviews and updates the IMPEP Qualification Form and supporting IMPEP Qualification Guide to reflect all changes in qualification; and,
- 4. Submits a current copy of the IMPEP Qualification Form to the IMPEP Project Manager prior to participating in any assigned reviews.

V. GUIDANCE

A. Documenting Qualifications

- 1. Each IMPEP team member should complete an IMPEP Qualification Guide for each indicator that the team member is qualified to act as principal reviewer or team leader, as appropriate.
- 2. Each IMPEP team member should complete the "General IMPEP Qualifications" guide in the IMPEP Qualification Guide.
- 3. Each IMPEP team member should fully document any grandfathering, interim qualification, or other alternative means of qualification used (including journal qualification under NRC Inspection Manual Chapter 1246, Formal

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Qualification Programs in the Nuclear Material Safety and Safeguards Program Area, etc.) in the "Alternative Criteria/Comments" sections provided in the IMPEP Qualification Guide. Attach additional sheets, if necessary.

- 4. The IMPEP Qualification Form should be signed by the IMPEP team member and the Director, FSME, or designee.
- 5. A copy of each completed IMPEP Qualification Form should be given to the IMPEP Project Manager to keep on file.

B. Updating Qualifications

- 1. Each time a new course is completed or new qualification is achieved, the team member's personal IMPEP Qualification Guide should be updated, as appropriate.
- 2. A new IMPEP Qualification Form should be completed each time an IMPEP participant becomes qualified to act as principal reviewer for an additional indicator or as team leader.

C. Refresher Training

IMPEP team members are only required to attend refresher training if: 1) they did not participate in an IMPEP review the previous fiscal year; 2) they did not receive new member training in the previous fiscal year; and 3) they are scheduled for a review in the upcoming fiscal year.

VI. APPENDIXES

Appendix A - IMPEP Qualification Form

Appendix B - IMPEP Qualification Guide

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VII. REFERENCES

- 1. Inspection Manual Chapter 1246, "Formal Qualification Programs in the Nuclear Material Safety & Safeguards Program Area."
- 2. NRC Management Directive 5.6, "Integrated Materials Performance Evaluation Program (IMPEP)."
- 3. NRC Management Directive 5.10, "Formal Qualifications for IMPEP Team Members."

VIII. ADAMS REFERENCE DOCUMENTS

For knowledge management purposes, all previous revisions of this procedure, as well as associated correspondence with stakeholders, that have been entered into the NRC's Agencywide Document Access Management System (ADAMS) are listed below.

No.	Date	Document Title/Description	Accession Number
1	12/1/00	STP Procedure SA-111	ML003781945
2	8/31/06	STP-06-079, Opportunity to Comment on Draft Revisions to STP Procedure SA-111	ML062440119
3	8/31/06	Draft STP Procedure SA-111	ML062440126

Appendix A



IMPEP QUALIFICATION FORM

	IPEP Team Member:		*************
Sig	gnature		Date
Pr	inted Name		Title
**	**************	*****	************
Of	fice Director, Regional Administrator, or Agre	ement S	State Program Director (or Designee):
Sig	gnature		Date
Pr	inted Name		Title
			THORIZATION licable boxes)
OMN	MON PERFORMANCE INDICATORS	NON-	-COMMON PERFORMANCE INDICATORS
	Technical Staffing and Training Status of Materials Inspection Program Technical Quality of Inspections		Compatibility Requirements Sealed Source and Device Evaluation Program: Full Technical Review
	Technical Quality of Licensing Actions Technical Quality of Incident and		Sealed Source and Device Evaluation Program: Limited Scope Review
	Allegation Activities: Incident Review Technical Quality of Incident and Allegation Activities: Allegation Review		Low-Level Radioactive Waste Disposal Program Uranium Recovery Program
	TEAM LEADER		

NOTE

Based on the guidelines established in Management Directive 5.10, Formal Qualifications for IMPEP Team Members, the supervisor above verifies that this IMPEP team member is fully qualified to act as principal reviewer and/or team leader, as noted.

Appendix B

GENERAL IMPEP QUALIFICATIONS

STAFF NAME:

Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
A. CORE TRAINING		
IMPEP Team Member Training		
B. SUPPLEMENTAL TRAINING		
N/A		
C. REFRESHER TRAINING		
IMPEP Team Member Training, as necessary pursuant to policy		

Formal Experience as Described in MD 5.10	COMPLETED? (Y/N)
D. SELF-STUDY	
NRC Management Directive 5.6, "Integrated Materials Performance Evaluation Program (IMPEP)"	
10 Code of Federal Regulations (CFR) 19/20	
10 CFR 30-36/39	
10 CFR 40/61/70/71	
10 CFR 150	
Final Statement of Principles and Policy for the Agreement State Programs	
Final Policy Statement on Adequacy and Compatibility of Agreement State Programs	
E. PROFESSIONAL EXPERIENCE - 2 years experience with a radioactive materials program before and within 5 years of participating in IMPEP	

Alternative Qualifications/Comments:		

TECHNICAL STAFFING AND TRAINING PRINCIPAL REVIEWER

STAFF NAME:			
Formal Courses as Described in MD 5.10	COMPLET (Y/N)	ED?	COURSE DATE
A. CORE TRAINING			
N/A			
B. SUPPLEMENTAL TRAINING			
Root Cause/Incident Investigation Workshop (G-205)			
C. REFRESHER TRAINING			
N/A			
Formal Experience as Described in MD 5.10			COMPLETED? (Y/N)
D. SELF-STUDY			
NRC IMC 1246, "Formal Qualification Programs in the Material Safety and Safeguards Program Area"	e Nuclear		
NRC/Organization of Agreement States Training Wor Recommendations for Agreement State Training Pro-	king Group grams		
Alternative Qualifications/Comments:			

STATUS OF MATERIALS INSPECTION PROGRAM PRINCIPAL LICENSE REVIEWER

STAFF NAME:		

Formal Courses as Described in MD 5.10	COMPLETED (Y/N)	D? COURSE DATE	<u> </u>
A. CORE TRAINING			
N/A			
B. SUPPLEMENTAL TRAINING			
Fundamentals of Inspection (G-101) or Inspection Procedures (G-108)			
Inspecting for Performance - Materials Version (G-304)			
Root Cause/Incident Investigation Workshop (G-205)			
C. REFRESHER TRAINING			
N/A			
Formal Experience as Described in MD 5.10		COMPLETED? (Y/N)	>
D. SELF-STUDY			
NRC IMC 2800, "Materials Inspection Program"			
NRC IMC 1220, "Processing of NRC Form 241 and Inspe Agreement States licensees operating under 10 CFR 150	ction of 0.20"		
NRC IMC 0610, "Nuclear Material Safety and Safeguards Reports"	Inspection		
Alternative Qualifications/Comments:			

TECHNICAL QUALITY OF INSPECTIONS PRINCIPAL REVIEWER

STAFF NAME:	

Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
A. CORE TRAINING		
Fundamentals of Inspection (G-101) or Inspection Procedures (G-108)		
Root Cause/Incident Investigation Workshop (G-205)		
Increased Controls Security Inspection		
Inspecting for Performance Course - Materials Version (G-304)		
Applied Health Physics (H-109), Introductory Health Physics (H-117), or Health Physics Technology (H-201)		
Diagnostic and Therapeutic Nuclear Medicine (H-304)		
Safety Aspects of Industrial Radiography (H-305)		
Transportation of Radioactive Materials (H-308)		
Brachytherapy, Gamma Knife and Emerging Technologies (H-313)		
B. SUPPLEMENTAL TRAINING		
Environmental Monitoring for Radioactivity (H-111)		
Internal Dosimetry & Whole Body Counting (H-312)		
Safety Aspects of Well Logging (H-314)		
Irradiator Technology (H-315)		
C. REFRESHER TRAINING		
Fundamentals of Inspection Refresher (G-102)		
Health Physics Topical Review (H-401)		

TECHNICAL QUALITY OF INSPECTIONS PRINCIPAL REVIEWER (cont.)

Formal Experience as Described in MD 5.10	COMPLETED? (Y/N)
D. SELF-STUDY	
NRC IMC 2800, "Materials Inspection Program"	
NRC IMC 1220, "Processing of NRC Form 241 and Inspection of Agreement State licensees operating under 10 CFR 150.20"	
NRC IMC 0610, "Nuclear Material Safety and Safeguards Inspection Reports"	
NRC Inspection Procedure 87100 Series, "License Materials Programs"	
All applicable Temporary Instructions (TIs) related to materials programs	
E. PROFESSIONAL EXPERIENCE - 2 years as an independent inspector before and within 5 years of participating in IMPEP	
Alternative Qualifications/Comments:	

TECHNICAL QUALITY OF LICENSING ACTIONS PRINCIPAL REVIEWER

Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
A. CORE TRAINING		
Licensing Practices and Procedures (G-109)		
Applied Health Physics (H-109), Introductory Health Physics (H-117), or Health Physics Technology (H-201)		
Diagnostic and Therapeutic Nuclear Medicine (H-304)		
Safety Aspects of Industrial Radiography (H-305)		
Transportation of Radioactive Materials (H-308)		
Brachytherapy, Gamma Knife and Emerging Technologies (H-313)		
B. SUPPLEMENTAL TRAINING		
Fundamentals of Inspection (G-101) or Inspection Procedures (G-108)		
Root Cause/Incident Investigation Workshop (G-205)		
Environmental Monitoring for Radioactivity (H-111)		
Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) (H-121)		
Internal Dosimetry & Whole Body Counting (H-312)		
Safety Aspects of Well Logging (H-314)		
Irradiator Technology (H-315)		
C. REFRESHER TRAINING		
Health Physics Topical Review (H-401)		

TECHNICAL QUALITY OF LICENSING ACTIONS PRINCIPAL REVIEWER (cont.)

Formal Experience as Described in MD 5.10	COMPLETED? (Y/N)
D. SELF-STUDY	
NRC IMC 2800, "Materials Inspection Program"	
NRC IMC 1220, "Processing of NRC Form 241 and Inspection of Agreement State licensees operating under 10 CFR 150.20"	
NRC Inspection Procedure 87100 Series, "License Materials Programs"	
NRC NUREG-1556 Series, "Consolidated Guidance About Materials Licenses"	
E. PROFESSIONAL EXPERIENCE - 2 years as an independent license reviewer before and within 5 years of participating in IMPEP	
Alternative Qualifications/Comments:	

TECHNICAL QUALITY OF INCIDENT AND ALLEGATION ACTIVITIES: INCIDENT REVIEW

Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
A. CORE TRAINING		
Fundamentals of Inspection (G-101) or Inspection Procedures (G-108)		
Root Cause/Incident Investigation Workshop (G-205)		
Applied Health Physics (H-109), Introductory Health Physics (H-117), or Health Physics Technology (H-201)		
Diagnostic and Therapeutic Nuclear Medicine (H-304)		
Safety Aspects of Industrial Radiography (H-305)		
Transportation of Radioactive Materials (H-308)		
Brachytherapy, Gamma Knife and Emerging Technologies (H-313)		
B. SUPPLEMENTAL TRAINING		
Environmental Monitoring for Radioactivity (H-111)		
Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) (H-121)		
Internal Dosimetry & Whole Body Counting (H-312)		
Safety Aspects of Well Logging (H-314)		
Irradiator Technology (H-315)		
C. REFRESHER TRAINING		
Fundamentals of Inspection Refresher (G-102)		
Health Physics Topical Review (H-401)		

TECHNICAL QUALITY OF INCIDENT AND ALLEGATION ACTIVITIES: INCIDENT REVIEW (cont.)

Formal Experience as Described in MD 5.10	COMPLETED? (Y/N)
D. SELF-STUDY	
NRC MD 8.2, "NRC Incident Response Program"	
NRC MD 8.3, "NRC Incident Investigation Program"	
NRC IMC 2800, "Materials Inspection Program"	
NUREG-1303, "Incident Investigation Manual"	
Handbook on Nuclear Materials Event Reporting in the Agreement States	
Nuclear Materials Event Database (NMED)	
E. PROFESSIONAL EXPERIENCE - some involvement with incident response before and within 5 years of participating in IMPEP	
Alternative Qualifications/Comments:	

TECHNICAL QUALITY OF INCIDENT AND ALLEGATION ACTIVITIES: ALLEGATION REVIEW

ALLEGATION	- VILVV	
STAFF NAME:		
Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
A. CORE TRAINING		
Allegations Training		
B. SUPPLEMENTAL TRAINING		
Root Cause/Incident Investigation Workshop (G-205)		
C. REFRESHER TRAINING		
N/A		
Formal Experience as Described in MD 5.10		COMPLETED? (Y/N)
D. SELF-STUDY		
NRC MD 8.8, "Management of Allegations"		
NRC Allegation Memoranda, 96-01, 96-02, 98-01, 00-001, 03-001, 04-002 and 04-003		
SECY-98-192, "Resolution of Allegations Concerning Agreement State Programs"	the Performance of	
SA-400, "Management of Allegations"		
E. PROFESSIONAL EXPERIENCE - some involvement or management of allegations before and within 5 years IMPEP		
Alternative Qualifications/Comments:		

COMPATIBILITY REQUIREMENTS PRINCIPAL REVIEWER

STAFF NAIVIE.		
Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
A. CORE TRAINING		
N/A		
B. SUPPLEMENTAL TRAINING		
Root Cause/Incident Investigation Workshop (G-205)		
C. REFRESHER TRAINING		
N/A		
		OOMBI ETERS
Formal Experience as Described in MD 5.10		COMPLETED? (Y/N)
D. SELF-STUDY		
NRC MD 5.8, "Proposed Section 274b Agreements With States"		
NRC MD 5.9, "Adequacy and Compatibility of Agreement State Programs"		
SA-200, "Compatibility Categories and Health & Safety Identification for NRC Regulations and Other Program Elements"		
SA-201, "Review of State Regulatory Requirements"		
E. PROFESSIONAL EXPERIENCE - direct involvement in some aspect of the promulgation of NRC or Agreement State regulations before and within 3 years of participating in IMPEP or the review of two Agreement State regulations for compatibility before and within 2 years of participating in IMPEP		
Alternative Qualifications/Comments:		

SEALED SOURCE AND DEVICE EVALUATION PROGRAM: FULL TECHNICAL REVIEW

Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
A. CORE TRAINING		
Sealed Source and Device Workshop		
Applied Health Physics (H-109), Introductory Health Physics (H-117), or Health Physics Technology (H-201)		
B. SUPPLEMENTAL TRAINING		
Root Cause/Incident Investigation Workshop (G-205)		
Diagnostic and Therapeutic Nuclear Medicine (H-304)		
Safety Aspects of Industrial Radiography (H-305)		
Brachytherapy , Gamma Knife and Emerging Technologies (H-313)		
Safety Aspects of Well Logging (H-314)		
C. REFRESHER TRAINING		
N/A		

Formal Experience as Described in MD 5.10	COMPLETED? (Y/N)
D. SELF-STUDY	
NUREG-1556, Vol. 3, "Consolidated Guidance About Materials Licenses"	
ANSI N538-1979, "Classification of Industrial Ionizing Radiation Gauging Devices"	
ANSI N542-1977, "Sealed Radioactive Source Classification"	
Regulatory Guide 6.9, "Establishing Quality Assurance Programs for the Manufacture and Distribution of Sealed Sources and Devices Containing Byproduct Material"	
E. PROFESSIONAL EXPERIENCE - 2 years experience as an independent SS&D reviewer before and within 5 years of participating in IMPEP	

Alternative Qualification	ons/Comments:		

SEALED SOURCE AND DEVICE EVALUATION PROGRAM: LIMITED SCOPE REVIEW

Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
A. CORE TRAINING		
Sealed Source and Device Workshop		
Applied Health Physics (H-109), Introductory Health Physics (H-117), or Health Physics Technology (H-201)		
B. SUPPLEMENTAL TRAINING		
Root Cause/Incident Investigation Workshop (G-205)		
Diagnostic and Therapeutic Nuclear Medicine (H-304)		
Safety Aspects of Industrial Radiography (H-305)		
Brachytherapy, Gamma Knife and Emerging Technologies (H-313)		
Safety Aspects of Well Logging (H-314)		
C. REFRESHER TRAINING		
N/A		

Formal Experience as Described in MD 5.10	COMPLETED? (Y/N)
D. SELF-STUDY	
NUREG-1556, Vol. 3, "Consolidated Guidance About Materials Licenses"	
ANSI N538-1979, "Classification of Industrial Ionizing Radiation Gauging Devices"	
ANSI N542-1977, "Sealed Radioactive Source Classification"	
Regulatory Guide 6.9, "Establishing Quality Assurance Programs for the Manufacture and Distribution of Sealed Sources and Devices Containing Byproduct Material"	
E. PROFESSIONAL EXPERIENCE - 5 years experience with a radioactive materials program before and within 10 years of participating in IMPEP	

Alternative Qualifications/Cor	mments:		

LOW-LEVEL RADIOACTIVE WASTE DISPOSAL PROGRAM PRINCIPAL REVIEWER

Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
A. CORE TRAINING		
N/A		
B. SUPPLEMENTAL TRAINING		
Root Cause/Incident Investigation Workshop (G-205)		
C. REFRESHER TRAINING		
N/A		
Formal Experience as Described in MD 5.10		COMPLETED?

Formal Experience as Described in MD 5.10	COMPLETED? (Y/N)
D. SELF-STUDY	
NUREG-1199, "Standard Format & Content of a License Application for a Low-Level Radioactive Waste Disposal Facility"	
NUREG-1200, "Standard Review Plan for the Review of a License Application for a Low-Level Radioactive Disposal Facility"	
NRC IMC 2401, "Near Surface Low-Level Radioactive Waste Disposal Facility Evaluation Program"	
Draft Branch Technical Position, "Low-Level Radioactive Waste Performance Assessment"	
10 CFR Part 61	
E. PROFESSIONAL EXPERIENCE - 2 years working as an inspector, license reviewer, or as a developer of regulatory programs for ensuring safety of LLRW disposal before and within 5 years of participating in IMPEP	

Alternative Qualifications/C	omments.		

URANIUM RECOVERY PROGRAM PRINCIPAL REVIEWER

STAFF NAME:		
-		

NRC IMC 2641, "In Situ Leach Facility Inspection Program"

STAFF NAME:		
Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
A. CORE TRAINING		
N/A		
B. SUPPLEMENTAL TRAINING		
Root Cause/Incident Investigation Workshop (G-205)		
C. REFRESHER TRAINING		
N/A		
Formal Experience as Described in MD 5.10		COMPLETED? (Y/N)
Formal Experience as Described in MD 5.10 D. SELF-STUDY		
•		
D. SELF-STUDY	ium Extraction	
D. SELF-STUDY 10 CFR Part 40, Appendix A NUREG-1569, "Standard Review Plan for In Situ Leach Uran	eclamation Plan	

E. PROFESSIONAL EXPERIENCE - 2 years working as an inspector, license reviewer, or as a developer of regulatory programs for ensuring safety of uranium recovery operations before and within 5 years of participating in IMPEP Alternative Qualifications/Comments:

TEAM LEADER QUALIFICATIONS

STAFF NAME:		

Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
A. CORE TRAINING		
Fundamentals of Inspection (G-101) or Inspection Procedures (G-108)		
Licensing Practices and Procedures (G-109)		
Inspection for Performance - Materials Version (G-304)		
Applied Health Physics (H-109), Introductory Health Physics (H-117), or Health Physics Technology (H-201)		
B. SUPPLEMENTAL TRAINING		
Root Cause/Incident Investigation Workshop (G-205)		
Diagnostic and Therapeutic Nuclear Medicine (H-304)		
Safety Aspects of Industrial Radiography (H-305)		
Transportation of Radioactive Materials (H-308)		
Brachytherapy, Gamma Knife and Emerging Technologies (H-313)		
Safety Aspects of Well Logging (H-314)		
Irradiator Technology (H-315)		
Leading NRC Work Teams		
Effective Communications for NRC Inspectors		
C. REFRESHER TRAINING		
N/A		

TEAM LEADER QUALIFICATIONS (cont.)

Formal Experience as Described in MD 5.10	COMPLETED? (Y/N)
D. SELF-STUDY	
NRC IMC 1220, "Processing of NRC Form 241 and Inspection of Agreement States licensees operating under 10 CFR 150.20"	
NRC IMC 1246, "Formal Qualification Programs in the Nuclear Materials Safety and Safeguards Program"	
NRC IMC 2800, "Materials Inspection Program"	
NRC MD 8.8, "Management of Allegations"	
E. PROFESSIONAL EXPERIENCE	
5 years experience with a radioactive materials program before and within 10 years of participating in IMPEP	
Qualified to act as principal reviewer for at least one performance indicator	
Participation in at least one IMPEP review as a principal reviewer for any indicator	
Participation as Team Leader In Training for at least one IMPEP Review	
Alternative Qualifications/Comments:	