



FSME Procedure Approval

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

SA-111

Issue Date:

Review Date:

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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.

 <p>Procedure Title: <i>Implementation of Management Directive 5.10</i> Procedure Number: SA-111</p>	<p>Page: 1 of Issue Date:</p>
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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 and Tribal~~ **Materials and Environmental Management** Programs (~~STP~~**FSME**) through the use of a written qualification guide for ~~STP~~**FSME** IMPEP team members and team leaders.

III. BACKGROUND

NRC conducts periodic assessments of ~~NRC Regional and Agreement State radiation control~~ **radioactive materials** programs and ~~NRC Regional offices~~ pursuant to ~~Management Directive (MD) 5.6, “Integrated Materials Performance Evaluation Program.”~~ IMPEP teams are comprised of staff from ~~STP~~**FSME**, ~~Office of Nuclear Material Safety and Safeguards (NMSS)~~, 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 ~~that are technically correct and~~ in accordance with NRC policies and procedures. To facilitate implementation of this directive ~~within FSME~~, an IMPEP Qualification Form and ~~an~~ IMPEP Qualification Guides have been prepared (see Appendix A and Appendix B, **respectively**).

IV. ROLES AND RESPONSIBILITIES

A. Director, ~~STP~~**FSME**:

- 1. ~~Ensure that personnel acting as IMPEP team members or team leaders meet the formal qualifications or alternate criteria as described in MD 5.10.~~
- 2. ~~Signs,~~ **or designates responsibility for signing,** the IMPEP Qualification Form for each ~~FSME~~ IMPEP participant.

B. Senior IMPEP Project Manager: for IMPEP Coordination:

1. Maintains current copies of the IMPEP Qualification Form for all IMPEP team members and supporting IMPEP Qualification Guides for all IMPEP team members in STP;
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 Guides, 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, for the team member's specific IMPEP responsibilities;
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 for or team leader, as appropriate.
2. Each IMPEP team member should complete the "General IMPEP Qualifications" guide in the IMPEP Qualification Guide.

3. ~~The~~ 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 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, STPF/SME, or designee. ~~All principal reviewer and team leader qualifications should be documented by the Director, STP.~~
5. A copy of each completed IMPEP Qualification Form and guide should be given to the Senior IMPEP Project Manager for IMPEP coordination 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.
- ~~3. Refresher training should be documented as a line item on the appropriate indicator forms as necessary, on a refresher training page and attached to the team member’s appropriate qualification guide.~~

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. APPENDICES

Appendix A - IMPEP Qualification Form

Appendix B - ~~Office of State and Tribal Programs~~ IMPEP Qualification Guide

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

IMPEP Team Member:

Signature

Date

Printed Name

Title

Office Director, Regional Administrator, or Agreement State Program Director (or Designee):

Signature

Date

Printed Name

Title

QUALIFICATION AUTHORIZATION (Please check all applicable boxes)

COMMON PERFORMANCE INDICATORS

- Technical Staffing and Training
- Status of Materials Inspection Program
- Technical Quality of Inspections
- Technical Quality of Licensing Actions
- Technical Quality of Incident and Allegation Activities: Incident Review
- Technical Quality of Incident and Allegation Activities: Allegation Review
- TEAM LEADER

NON-COMMON PERFORMANCE INDICATORS

- ~~Legislation and Program Elements Required for~~
~~Compatibility~~ **Compatibility Requirements**
- Sealed Source and Device Evaluation Program: Full Technical Review
- Sealed Source and Device Evaluation Program: Limited Scope Review
- Low-Level Radioactive Waste Disposal Program
- Uranium Recovery Program
- ~~Fuel Cycle Inspection Program~~
- ~~Site Decommissioning Management Plan~~

NOTE

*Based on the guidelines established in Management Directive 5.10, Formal Qualifications for IMPEP Team Members, the **manager/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 Orientation	
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	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)
D. SELF-STUDY	
NRC IMC 1246, "Formal Qualification Programs in the Nuclear Material Safety and Safeguards Program Area"	
NRC/Organization of Agreement States Training Working Group Recommendations for Agreement State Training Programs	
E. PROFESSIONAL EXPERIENCE - 2 years experience with a radioactive materials program before and within 5 years of participating in IMPEP	

Alternative Qualifications/Comments:

**STATUS OF MATERIALS INSPECTION PROGRAM
PRINCIPAL LICENSE REVIEWER**

STAFF NAME:

Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
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," Report of Proposed Activities in Non-Agreement States , and Inspection of Agreement States licensees operating under 10 CFR 150.20"	
NRC IMC 0610, " Nuclear Material Safety and Safeguards Inspection Reports"	
E. PROFESSIONAL EXPERIENCE - 2 years experience with a radioactive materials program before and within 5 years of participating in IMPEP	

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)		
Teletherapy and Brachytherapy , Gamma Knife and Emerging Technologies (H-313)		
B. SUPPLEMENTAL TRAINING		
Environmental Monitoring for Radioactivity (H-111)		
Air Sampling for Radioactive Materials (H-119)		
Radiological Surveys in Support of Decommissioning (H-120)		
Respiratory Protection (H-311)		
Internal Dosimetry & Whole Body Counting (H-312 4)		
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 LICENSING ACTIONS
PRINCIPAL REVIEWER**

STAFF NAME:

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 Course (H-308)		
Teletherapy and 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)		
Air Sampling for Radioactive Material (H-119)		
Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) (H-121)		
Respiratory Protection (H-131)		
Internal Dosimetry & Whole Body Counting (H-314 2)		
Safety Aspects of Well Logging (H-314)		
Irradiator Technology (H-315)		
C. REFRESHER TRAINING		
Health Physics Topical Review (H-401)		

**RESPONSE TO INCIDENTS AND ALLEGATIONS:
INCIDENT RESPONSE LIMITED REVIEW
TECHNICAL QUALITY OF INCIDENT AND ALLEGATION ACTIVITIES:
PRINCIPAL INCIDENT 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)		
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)		
Teletherapy and Brachytherapy , Gamma Knife and Emerging Technologies (H-313)		
B. SUPPLEMENTAL TRAINING		
Environmental Monitoring for Radioactivity (H-111)		
Air Sampling for Radioactive Material (H-119)		
Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) (H-121)		
Respiratory Protection (H-131)		
Internal Dosimetry & Whole Body Counting (H-314 2)		
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)
<i>D. SELF-STUDY</i>	
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)	
<i>E. PROFESSIONAL EXPERIENCE - some involvement with incident response before and within 5 years of participating in IMPEP</i>	

Alternative Qualifications/Comments:

~~LEGISLATION AND PROGRAM ELEMENTS
REQUIRED FOR COMPATIBILITY REQUIREMENTS~~
PRINCIPAL REVIEWER

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)
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**

STAFF NAME:

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 Qualifications/Comments:

**SEALED SOURCE AND DEVICE EVALUATION PROGRAM:
LIMITED SCOPE TECHNICAL REVIEW**

STAFF NAME:

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)		
Teletherapy and 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/Comments:

**LOW-LEVEL RADIOACTIVE WASTE DISPOSAL PROGRAM
PRINCIPAL REVIEWER**

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)
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"	
NUREG-1274, "Review Process for Low-Level Radioactive Waste Disposal License Applications Under Low-level Radioactive Waste Policy Amendments Act"	
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/Comments:

**URANIUM RECOVERY PROGRAM
PRINCIPAL REVIEWER**

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)
D. SELF-STUDY	
10 CFR Part 40, Appendix A	
NUREG-1569, "Standard Review Plan for In Situ Leach Uranium Extraction License Applications"	
NUREG-1620, "Standard Review Plan for the Review of a Reclamation Plan for Mill Tailings Sites Under Title II of the Uranium Mill Tailings Radiation Control Act"	
NRC IMC 2801, "Uranium Mill and 11e.(2) Byproduct Material Disposal Site and Facility Inspection Program"	
NRC IMC 2641, "In Situ Leach Facility Inspection Program"	
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)		
Leading NRC Work Teams (PDC)		
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)		
Teletherapy and Brachytherapy , Gamma Knife and Emerging Technologies (H-313)		
Safety Aspects of Well Logging (H-314)		
Irradiator Technology (H-315)		
Managing Other People's Writing (PDC) Leading NRC Work Teams		
Situational Leadership (PDC)		
Effective Communications for NRC Inspectors (OP)		
IMPEP Leader Course		
C. REFRESHER TRAINING		
N/A		

TEAM LEADER QUALIFICATIONS (cont.)

Formal Experience as Described in MD 5.10	COMPLETED? (Y/N)
<i>D. SELF-STUDY</i>	
NRC IMC 1220, "Processing of NRC Form 241," Report of Proposed Activities in Non-Agreement States , 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 Management Directive 8.8, "Management of Allegations"	
<i>E. PROFESSIONAL EXPERIENCE</i>	
5 years experience with a radiation 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:
