Randy Erickson

From: Vinson, Gibb [Gibb.Vinson@illinois.gov]
Sent: Wednesday, April 22, 2009 4:06 PM
To: Randy Erickson
Cc: Eastvold, Paul
Subject: Illinois IMPEP Questionnaire 2009
Attachments: IMPEPRPT2009.doc; ATTACH 1.pdf; ATTACH 2.pdf; ATTACH 3.pdf; ATTACH 4.pdf; ATTACH 5.pdf; ATTACH 6.pdf; ATTACH 7.pdf; ATTACH 8.pdf; ATTACH 9.pdf; ATTACH 10.pdf; ATTACH 11.pdf; ATTACH 12.pdf; impepcover 2009 (3).doc

Dear Mr. Erickson,

Please find attached our reply to the IMPEP Questionnaire for our May 11-15, 2009 review. A hard copy will follow this week. As noted this morning, we have taken Attachment 11 out of this e-mail for security reasons. A copy was faxed to you earlier. This attachment will be included in the hard copy.

We have arranged for a conference room for the week you are here to use for file reviews, interviews and team meetings. An entrance greeting is scheduled for 8:30 a.m. on May 11, 2009. We have also arranged for a close out meeting with our management on May 15, 2009 at 9:00 a.m. Generally, we assemble our technical staff with the IMPEP Team on the first day to go through introductions and cover the review process. Let me know how you want to proceed with this.

If you need any other details such as lodging or restaurant recommendations, feel free to contact me, and I will be happy to assist you with this.

Regards,

Gibb Vinson, Head
Radioactive Materials Section
Illinois Emergency Management Agency
(217)785-9928

Approved by OMB[1]
No. 3150-0183
Expires 08/31/2010

INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM

QUESTIONNAIRE

Illinois
Reporting Period: April 9, 2005, to May 15, 2009.
Compatibility Requirements: June 8, 2006, to May 15, 2009.

Note: If there has been no change in the response to a specific question since the last IMPEP questionnaire, the State or Region may copy the previous answer, if appropriate.

A. GENERAL

1. Please prepare a summary of the status of the State's or Region's actions taken in response to the comments and recommendations following the last review.

   The NRC's 2005 review team recommended that the State adopt the regulations, or other legally binding requirements, which are overdue for adoption and send them to the NRC for review. Subsequently, IEMA submitted and adopted 35 Federal Regulations. Two sets of security measures have also been adopted by license condition since no corresponding rulemaking is currently available for these measures. IEMA staff continuously monitors the 'State Regulation Status' sheet on the FSME website to track and implement upcoming regulations. IEMA begins the rulemaking process 1 – 2 years before the specific regulation is due for adoption. On August 15, 2006, NRC's MRB met and determined that IEMA was completely compatible with regulations. In addition, an interim periodic meeting was held on January 15, 2008, that indicated all regulations were current.

[1] Estimated burden per response to comply with this voluntary collection request: 53 hours. Forward comments regarding burden estimate to the Records Management Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0183), Office of Management and Budget, Washington, DC 20503. If an information collection does not display a currently valid OMB control number, NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

B. COMMON PERFORMANCE INDICATORS

I. Technical Staffing and Training

2. Please provide the following organization charts, including names and positions:

   (a) A chart showing positions from Governor down to Radiation Control Program Director;

   (b) A chart showing positions of current radiation control program including management; and

   (c) Equivalent charts for sealed source and device evaluation, low-level radioactive waste and uranium recovery programs, if applicable.

See Attachment 1.

3. Please provide a staffing plan, or complete a listing using the suggested format below, of the professional (technical) full-time equivalents (FTE) applied to the radioactive materials program by individual. Include the name, position, and, for Agreement States, the fraction of time spent in the following areas: administration, materials licensing & compliance, emergency response, low-level radioactive waste, uranium recovery, other. If these regulatory responsibilities are divided between offices, the table should be consolidated to include all personnel contributing to the radioactive materials program. Include all vacancies and identify all senior personnel assigned to monitor work of junior personnel. If consultants were used to carry out the program's radioactive materials responsibilities, include their efforts. The table heading should be:

Name	Position	Area of Effort	FTE%
Andrew Velasquez III	Director	Administration	3
Joseph Klinger	Assistant Director	Administration	10
Paul Eastvold	Bureau Chief-Radiation Safety	Administration	50
Charles Vinson	Radioactive Materials Section Head	Administration	100
Steve Collins	Acting Materials Licensing Unit Supervisor	Materials Licensing Supervision	75
Mary Burkhart	Materials License Reviewer	Materials Licensing	90
Sandi Kessinger	Materials License Reviewer	Materials Licensing	90
Richard Hasty	Materials License Reviewer	Materials Licensing	100
James Ewan	Materials License Reviewer	Materials Licensing	100
Daren Perrero	Inspection & Enforcement Unit Supervisor	Inspection & Enforcement Supervision	100
Andy Gulczynski	Regional Inspector Supervisor	Inspection & Enforcement Supervision	100
Robin Muzzalupo	Inspector	Inspection & Enforcement	100

Wendell Hickman	Inspector	Inspection & Enforcement	100
John Papendorf	Inspector	Inspection & Enforcement	100
Joanne Kark	Inspector	Inspection & Enforcement	100
George Merrihew	Inspector	Inspection & Enforcement	100
Gary McCandless	Bureau Chief-Environmental Safety	Administration	20
John Barcalow	LLRW License & Decommissioning Reviewer	LLRW Licensing, Decommissioning, Financial Surety	100
Kelly Grahn	W. Chicago On-Site Resident Inspector/ LLRW License Reviewer	Inspection, Licensing, 274i Inspections	100
Marjorie Walle	Site Decommissioning Reviewer	Decommissioning	50
Michelle Rauworth	Laboratory Supervisor	Kerr McGee project Laboratory Analysis	50
Mike Klebe	Unit Supervisor	LLRW& Decommissioning Supervision	100

Sealed Source & Device Program:

Name	Position	Area of Effort	FTE%
Steve Collins	Acting Materials Licensing Unit Supervisor	Materials Licensing, Supervision	10
Mary Burkhart	Materials License Reviewer	Materials Licensing	10
Sandi Kessinger	Materials License Reviewer	Materials Licensing	10

Consulting Co. Name	Area of Effort	FTE%
Hanson Engineers, Inc.	Engineering technical support for license review and evaluation and construction oversight of decommissioning activities at Kerr-McGee's W. Chicago facility	Approximately 20 individuals totaling 4 FTE (FY09)

Subcontractors:

URS, Inc.	Health Physics
Intera, Inc.	Hydrology & Geotechnical
REM, L.L.C.	Sampling & Verification Studies
Legal Services:	Financial assurance
Holland & Knight Law	arrangements for Tronox, West Chicago Rare Earths Facility

4. Please provide a listing of all new professional personnel hired since the last review, indicate the degree(s) they received, if applicable, and additional training and years of experience in health physics, or other disciplines, as appropriate.

   Richard D. Hasty – BS, Physics; MS/Ph.D., Nuclear Physics; 8 years of experience in nuclear physics in teaching, research and instrument development.

5. Please list all professional staff who have not yet met the qualification requirements for a license reviewer or materials inspector. For each, list the courses or equivalent training/experience they need and a tentative schedule for completion of these requirements.

   Richard D. Hasty was hired on October 1, 2008. He has been through a documented orientation on agency operating procedures. He has also been documented as competent in licensing for portable/fixed gauges and diagnostic medical uses. He was scheduled to attend NRC courses G-109 (Licensing), H-304 (Nuclear Medicine) and H-319 (Brachytherapy) in March 2009. However, he was denied attendance to H-304 and H-319. G-109 has been completed. Completion of all NRC core courses is anticipated within the next 2-3 years.

6. Identify any changes to your qualification and training procedure that occurred during the review period.

   Increased Controls and National Source Tracking System training was added.

7. Please identify the technical staff that left your program during the review period.

   Joe Klinger (Head of Radioactive Materials), David Price (License Reviewer) and Ted Henry (License Reviewer).

8. List any vacant positions in your program, the length of time each position has been vacant, and a brief summary of efforts to fill the vacancy.

Currently, we have 2 vacancies. One is a license reviewer position that has been vacant since January 1, 2009. The other is the Supervisor of Radioactive Materials Licensing position that has been vacant since June 16, 2008. The Head of the Radioactive Materials Section (Joe Klinger) was promoted to Agency Asst. Director in January 2007. The Licensing Supervisor (Gibb Vinson) was named as Acting Section Head at that time. Licensing duties were performed by the Acting Section Head until October 16, 2008 when the Head of the Registration and Certification Section (Steve Collins) was named as the Acting Licensing Supervisor.

9. For Agreement States, does your program have an oversight board or committee which provides direction to the program and is composed of licensees and/or members of the public? If so, please describe the procedures used to avoid any potential conflict of interest.

Yes. Board members are required to complete a conflict of interest questionnaire for the Governor's office before they are appointed. Board members are also required to take annual ethics training and pass a test following such training. During the course of the training, Board members are instructed to contact a Governor-appointed Ethics Officer if there is a perceived conflict of interest.

II. Status of Materials Inspection Program

10. Please identify individual licensees or categories of licensees the State is inspecting less frequently than called for in NRC's Inspection Manual Chapter (IMC) 2800 and explain the reason for the difference. The list only needs to include the following information: licensee name, license number, your inspection interval, and rationale for the difference.

The Agency inspects at frequencies at least as restrictive as IMC 2800. See Attachment 2.

11. Please provide the number of routine inspections of Priority 1, 2, and 3 licensees, as defined in IMC 2800; the number of initial inspections; and the number of increased controls inspections that were completed during the review period.

Please see Attachments 3 (routine), 4 (initial) and 5 (IC) for inspections conducted in the review period.

For Tronox (Kerr-Mcgee), an inspector is located on site. For Chicago Magnesium, an inspector visits the site during cleanup activities when contractor is onsite.

LLRW participated extensively in auditing ADCO 860134701 in 2007 through 2009 to assure that ADCO meets the requirements for financial assurance and does not hold waste longer than specified in their license. This included participation in an inspection in November 2007.

12. Please submit a table, or a computer printout, that identifies inspections of Priority 1, 2, and 3 licensees, increased controls, and initial inspections that were conducted overdue per the applicable guidance. Priority 1, 2, and 3 licensees and initial inspections must be conducted at least as frequently as the inspection intervals established in IMC 2800. Increased controls inspections should be conducted at the intervals established in the Staff Requirements Memorandum for COMSECY-05-0028.

    At a minimum, the list should include the following information for each inspection that was conducted overdue during the review period:

    (1) Licensee Name
    (2) License Number
    (3) Priority (IMC 2800)
    (4) Last inspection date or license issuance date, if initial inspection
    (5) Date Due
    (6) Date Performed
    (7) Amount of Time Overdue
    (8) Date inspection findings issued

    See Item 11 above. Typically, we have no overdue inspections. On occasion, we have scheduling problems because of licensee availability, other priority IC inspections or incidents. In these cases, inspections are immediately rescheduled within the next few weeks. Increased Control inspections have been completed ahead of the schedule in COMSECY-05-0028.

13. Please submit a table or computer printout that identifies any Priority 1, 2, and 3 licensees, increased controls, and initial inspections that are currently overdue, per the applicable guidance. At a minimum, the list should include the same information for each overdue inspection provided for Question 12 plus your action plan for completing the inspection.

    Please see Item 12 above.

14. Please provide the number of reciprocity licensees that were candidates for inspection per year as described in IMC 1220 and the number of candidate licensee reciprocity inspections that were completed each year during the review period.

Data to reflect licensees which were candidates for inspection is not maintained on a per year basis. They are tracked as either 'current' or 'not current'. For those licensees that were 'current' during their authorization period, inspections were conducted as resources were available. See Attachments 6 and 7.

III. Technical Quality of Inspections

15. What, if any, changes were made to your written inspection procedures during the reporting period?

See Item 22.

16. Prepare a table showing the number and types of supervisory accompaniments made during the review period. Include:

Inspector	Supervisor	License Category	Date

See Attachment 8.

17. Describe or provide an update on your instrumentation, methods of calibration and laboratory capabilities. Are all instruments properly calibrated at the present time? Were there sufficient calibrated instruments available throughout the review period?

Agency inspectors are transitioning to a new portable gamma spectroscopy unit. All instruments are properly calibrated either in our certified calibration lab or at an approved vendor. Calibrated instruments are always available.

IV. Technical Quality of Licensing Actions

18. How many specific radioactive material licenses does the Program regulate at this time?

Licensees

736

SSD's

63 active registries
12 manufacturers

LLRW

LLRW Section currently reviews two licenses: STA-583 – Tronox and 860225101 – Water Remediation Technologies.

19. Please identify any major, unusual, or complex licenses which were issued, received a major amendment, were terminated, decommissioned, submitted a bankruptcy notification or renewed in this period.

See Attachment 9 (license actions) and 10 (bankruptcies). We have no facilities with emergency plans.

LLRW & Decommissioning

Decommissioned: 860175001 Spectrulite - June 2008

Partially decommissioned 860147701 Richardson Electronics - March 2006

Ongoing decommissioning: Chicago Magnesium Casting Co. - 860107701. Decommissioning work has been done in phases in order to help the company obtain the financing for the cleanup. Extensive ground contamination needed to be removed because they buried material onsite during the 1960's and 1970's.

For the Uranium Recovery Program:

For the Tronox decommissioning project in West Chicago, Illinois amendments were issued:

- **Authorizing annual volume of waste shipments and annual volume of material received from off site. Various times including February 24, 2006, February 21, 2007, February 11, 2008 and February 26, 2009**
- **Revised the Air Monitoring Program - February 11, 2008 and February 26, 2009**

20. Identify any licensees or groups of licensees that were issued increased controls during the review period. Those licensees that were initially identified during the initial implementation of increased controls need not be listed.

See Attachment 11. These are all the IC's that we currently have on file.

21. Discuss any variances in licensing policies and procedures or exemptions from the regulations granted during the review period.

For Materials Licensees

"Release of Patients Treated with I-131 TM601 (transmolecular glioma)."

"Release of Patients Undergoing Radiopharmaceutical Therapy."

(Both of these exemptions were drafted to meet the equivalent patient release regulations in 10 CFR 35.75 that was later adopted by the Agency.)

For Sealed Source and Device Program

None

For Low-Level Radioactive Waste Disposal Program

None

For Uranium Recovery Program

None

22. What, if any, changes were made in your written licensing procedures (new procedures, updates, policy memoranda, etc.) during the reporting period?

Administrative procedures have changed primarily as a result of increased control requirements with regards to how we handle and process documents. We have also developed an Agency 'Need-to-know' list for persons that can access our SGI-M license files. This and our standard operations manual will be available for review by the IMPEP team.

Here is a list of our current Policy Memoranda:

ACTIVE MEMORANDA/POLICY INDEX

Memo to RAM Staff regarding Increased Controls. (September 20, 2005)

Memo to RAM Staff regarding Controls Condition. (October 7, 2005)

Memo to RAM Staff regarding Controls Condition. (October 19, 2005)

Memo to RAM Staff regarding Security Review for All Actions. (April 28, 2006)

Memo to Technical Staff regarding Policy Concerning Increased Controls Inspection Prioritization. (May 18, 2006)

Memo to RAM Staff regarding Security Checklist/Background Checks. (August 1, 2007)

Memo to RAM Staff regarding Security Checklist/Background Checks. (February 11, 2008)

Memo to RAM Staff regarding Increased Controls Requirements. (March 28, 2008)

Memo to RAM Staff regarding Non-Collocation Condition. (May 6, 2008)

Memo to RAM Staff regarding Security Related Information, NRC Information Notice 2008-03. (July 16, 2008)

Memo to RAM Staff regarding Fingerprint Reminder Letter. (September 10, 2008)

Memo to RAM Staff regarding Specialty Board(s) Certification Recognized by NRC Under 10 CFR Part 35. (September 19, 2008)

Memo to RAM Staff regarding Acting Unit Head. (October 16, 2008)

Memo to RAM Staff regarding Technical Request Form. (December 1, 2008)

Memo to RAM Staff regarding Steve Collins as Acting Licensing Unit Supervisor. (January 14, 2009)

Memo to RAM Staff regarding Security Checklist/Background Checks. (March 13, 2009)

Memo to Gibb Vinson (distributed to RAM staff) regarding Revisions to Standard Conditions. (March 25, 2009)

For the Financial Assurance Program:

Financial Assurance Requirements, Part 326 was revised to incorporate revisions regarding sealed sources activity limits and clarify exemptions allowed. "Guidance Document on Financial Assurance" Revision 2 was issued January 2007 and is currently under review for updates. There are 72 active general and specific licensee that have posted financial assurance arrangements and these licensee are being monitored.

For the Decommissioning Program:

"Decommissioning Guidance for Radioactive Material Licensees" was issued February 2007 and is currently under review for updates

Orphan Source Program

For safety and security, the LLRW and Decommissioning Section have revised the Orphan Source Program to collect, track and periodically dispose of Orphan sources. The Bureau of Environmental Safety established two locations to safely secure these sources. The Program was also expanded to collect unwanted radioactive material at various junior and senior high schools throughout the state.

23. Identify by licensee name and license number any renewal applications that have been pending for one year or more. Please indicate why these reviews have been delayed and describe your action plan to reduce the backlog.

No renewals over a year are pending.

V. Technical Quality of Incident and Allegation Activities

24. For Agreement States, please provide a list of any reportable incidents not previously submitted to NRC (See Procedure SA-300, *Reporting Material Events*, for additional guidance, OMB clearance number 3150-0178). The list should be in the following format:

Licensee Name	License #	Date of Incident/Report	Type of Incident

All reportable incidents have been submitted to NRC as of this date.

25. During this review period, did any incidents occur that involved equipment or source failure or approved operating procedures that were deficient? If so, how and when were other State/NRC licensees who might be affected notified? For States, was timely notification made to NRC? For Regions, was an appropriate and timely PN generated? For Agreement States, was information on the incident provided to the agency responsible for evaluation of the device for an assessment of possible generic design deficiency? Please provide details for each case.

Any incidents that occurred involving equipment or source failure or approved operating procedures that failed were reported to NMED for trend analysis.

26. Identify any changes to your procedures for responding to incidents and allegations that occurred during the period of this review.

N/A

C. NON-COMMON PERFORMANCE INDICATORS

I. Compatibility Requirements

27. Please list all currently effective legislation that affects the radiation control program. Denote any legislation that was enacted or amended during the review period.

20 ILCS 3305/ Illinois Emergency Management Agency Act

20 ILCS 3310/ Nuclear Safety Law of 2004.

FREEDOM OF INFORMATION ACT [5 ILCS 140/1 - 140/11]

ILLINOIS ADMINISTRATIVE PROCEDURE ACT [5 ILCS 100/1-1 - 15-100]

Radioactive Waste Storage Act [420 ILCS 35]

Radiation Protection Act of 1990 [420 ILCS 40]

Uranium and Thorium Mill Tailings Control Act [420 ILCS 42]

28. Are your regulations subject to a "Sunset" or equivalent law? If so, explain and include the next expiration date for your regulations.

Public Act 91-752 which was effective June 2, 2000, extended the sunset date for the Radiation Protection Act of 1990 until January 1, 2011.

29. Please review and verify that the information in the enclosed State Regulation Status (SRS) sheet is correct. For those regulations that have not been adopted by the State, explain why they were not adopted, and discuss actions being taken to adopt them. If legally binding requirements were used in lieu of regulations, please describe their use.

The 'Notes' for RATS ID 1995-7 indicates that Illinois has not yet adopted the equivalent regulations for RATS ID 2005-2. However, RATS ID 2005-2 states that it was final with no comments on 9/18/08. The Agency has discussed this with Kathleen Schneider, State Regulation Review Coordinator, and determined that 2005-2 is in fact complete. Her copy of the SRS tracking sheet has been updated accordingly. IEMA is currently compatible will all NRC regulations. Only 2 (Rats ID 2005-3 and 2007-4) have been adopted by license condition since no corresponding rule exists to date for these increased controls.

30. If you have not adopted all amendments within three years from the date of NRC rule promulgation, briefly describe your State's procedures for amending regulations in order to maintain compatibility with the NRC, showing the normal length of time anticipated to complete each step.

IEMA had one regulation (Rats ID 2005-2) that exceeded the 3 year deadline by two months. This regulation change was ready for first notice when the National Source Tracking Rule (Rats 2006-3) was issued by NRC with an accelerated deadline for implementation due to Congressional urgency on security matters. Generally, the Illinois Joint Committee on Administrative Rules (JCAR) does not look favorably on two substantive changes to the same part in one session (in this case our Part 330). Consequently, Rats ID 2006-3 was accelerated through the process to the detriment of RATS ID 2005-2. This is confirmed by the SRS tracking sheet as Rats 2006-3 was finalized before Rats 2005-2. However, all regulations are now compatible.

When a rulemaking is contemplated, a description of the proposed rule is submitted to the Illinois Secretary of State Index Unit to be listed on the semiannual Regulatory Agenda. The Regulatory Agenda is published in the Illinois Register and allows the Agency to obtain comments from the public prior to proposing rulemaking.

Agency staff drafts the rule, taking into account NRC's rule, comments previously submitted to the NRC, any CRCPD language available, and comments on that section of the rule previously identified as needing to be fixed. After drafting, rules are typically provided to staff for internal review and comment. Writing a rule can take anywhere from a couple of weeks to several months, depending upon the number of changes to be made and the number of comments received. The draft rules are subsequently submitted to the Director's Office and the Governor's office for approval prior to 1st Notice.

Once all approvals are obtained and comments incorporated, the proposed rule is submitted for 1st Notice to the Joint Committee on Administrative Rules (JCAR), a bipartisan committee consisting of legislators from the State House of Representatives and the Senate. First Notice is a 45 day public comment period that begins on the day the proposed rule is published in the Illinois Register. The public may submit comments on the proposed rule to the Agency and the Agency will respond to the public comments in its 2nd Notice filings with JCAR.

The 2nd Notice period for normal* rulemakings is 45 days. The Agency must answer all questions posed by JCAR staff (both in 1st & 2nd Notice) during 2nd Notice. JCAR may request that the Agency modify or clarify the language of the proposed rulemaking if JCAR determines the Agency does not have statutory authority, language is inappropriate or ambiguous. This is also the time to work out any problems that might have arisen since the rulemaking was first proposed. At the end of the 2nd Notice period, a hearing is held before JCAR in which they may ask additional questions of the Agency. After the hearing is held, unless JCAR issues an objection to the rulemaking, the Agency may file for adoption.

*For identical in substance rulemakings or those rulemakings necessary to implement, secure, or maintain federal authorization for a program (i.e., Compatibility Levels A & B), the Agency may adopt the verbatim text of laws, regulations, or orders as necessary and appropriate for authorization or maintenance of the program. For identical in substance rulemakings, the Agency shall publish 1st Notice of the rulemaking in the Illinois Register to provide public notice and opportunity for public comment; specifically refer to the appropriate federal laws, regulations, or orders; and follow the format reasonably prescribed by the Secretary of State by rule. These rulemakings become effective following the 45 day 1st Notice period immediately upon filing for adoption with the Secretary of State or at a date required or authorized by the relevant federal laws, regulations, or orders as stated in the notice of the rulemaking, and shall be published in the Illinois Register.

II. Sealed Source and Device (SS&D) Evaluation Program

31. Prepare a table listing new and amended (including transfers to inactive status) SS&D registrations of devices issued during the review period. The table heading should be:

SS&D Registry Number	Manufacturer, Distributor or Custom User	Product Type or Use	Date Issued	Type of Action

See Attachment 12.

32. Please include information on the following questions in Section A, as they apply to the SS&D Program:

Technical Staffing and Training – **See Questions 2-9**
Technical Quality of Licensing Actions - **See Questions 18-23**
Technical Quality of Incident and Allegation Activities – **See Questions 24-26**

III. Low-Level Radioactive Waste Disposal Program

33. Please include information on the following questions in Section A, as they apply to the Low-Level Radioactive Waste Disposal Program:

Technical Staffing and Training – **See Questions 2-9**
Status of Materials Inspection Program – **See Questions 10-14**
Technical Quality of Inspections – **See Questions 15-17**
Technical Quality of Licensing Actions – **See Questions 18-23**
Technical Quality of Incident and Allegation Activities – **See Questions 24-26**

IV. Uranium Recovery Program

34. Please include information on the following questions in Section A, as they apply to the Uranium Recovery Program:

Technical Staffing and Training – **See Questions 2-9**
Status of Materials Inspection Program – **See Questions 10-14**
Technical Quality of Inspections – **See Questions 15-17**
Technical Quality of Licensing Actions – **See Questions 18-23**
Technical Quality of Incident and Allegation Activities – **See Questions 24-26**

MATERIALS REQUESTED TO BE AVAILABLE FOR
THE ON-SITE PORTION OF AN IMPEP REVIEW

Please have the following information available for use by the IMPEP review team when they arrive at your office:

- ☐ List of open license cases, with date of original request, and dates of follow-up actions.
- ☐ List of licenses terminated during review period.
- ☐ Copy of current log or other document used to track licensing actions.
- ☐ List of all licensing actions completed during the review period (sorted by license reviewer, if possible).
- ☐ Copy of current log or other document used to track inspections.
- ☐ List of all inspections completed during the review period (sorted by inspector, if possible).
- ☐ List of inspection frequencies by license type.
- ☐ List of all allegations occurring during the review period. Show whether the allegation is open or closed and whether it was referred by NRC.

ALSO, PLEASE HAVE THE FOLLOWING DOCUMENTS AVAILABLE:

- ☐ All State regulations
- ☐ Statutes affecting the regulatory authority of the State program
- ☐ Standard license conditions
- ☐ Technical procedures for licensing, model licenses, review guides
- ☒ SS&D review procedures, guides, and standards
- ☐ Instrument calibration records
- ☒ Inspection procedures and guides
- ☒ Inspection report forms
- ☐ Documented training plan, if applicable
- ☐ Records of results of supervisory accompaniments of inspectors
- ☐ Emergency plan and communications list
- ☐ Procedures for investigating allegations
- ☐ Procedures for investigating incidents
- ☐ Enforcement procedures, including procedures for escalated enforcement, severity levels, civil penalties (as applicable)
- ☒ Job description