

June 16, 2009

MEMORANDUM TO: Samuel J. Collins, Administrator
Region I

FROM: Robert J. Lewis, Director **/RA/**
Division of Materials Safety
and State Agreements
Office of Federal and State Materials
and Environmental Management Programs

SUBJECT: MAY 13, 2009 PERIODIC MEETING UNDER THE INTEGRATED
MATERIALS PERFORMANCE EVALUATION PROGRAM
(IMPEP)

A periodic meeting with Region I was held on May 13, 2009. The purpose of the meeting was to review and discuss the status of the Region I Radioactive Materials Program. The Office of Federal and State Materials and Environmental Management Programs (FSME) was represented by Leira Cuadrado and me. Specific topics and issues of importance discussed at the meeting included status of operating plan and performance metrics, status of staffing and training, licensing and inspection program changes since the last IMPEP, and a review of regional self assessments. I have enclosed a meeting summary.

Enclosure:

1. Periodic Meeting Summary for Region I

cc w/ encl: John Kinneman, Director
Division of Nuclear Materials Safety

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cc w/ encl: John Kinneman, Director
Division of Nuclear Materials Safety

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PERIODIC MEETING SUMMARY FOR THE REGION I
RADIOACTIVE MATERIALS PROGRAM

MEETING DATE: May 13, 2009

ATTENDEES:	<u>FSME</u>	<u>Region I</u>
	Robert Lewis	John Kinneman
	Leira Cuadrado	Daniel Collins
		Joe Nick
		Mark Dapas (entrance and exit only)

DISCUSSION:

The Region I radioactive materials program is administered by the Division of Nuclear Materials Safety (the Division). The Division is composed of four branches: the Commercial and Research and Development Branch, the Decommissioning Branch, the Medical Branch, and the Material Security and Industrial Branch.

The previous IMPEP review was conducted the week of April 4-8, 2005. The review team found Region I's performance to be satisfactory for all performance indicators reviewed. Accordingly, the review team recommended, and the MRB agreed, that the Region I program is adequate to protect public health and safety.

Status of operating plan metrics:

No issues were identified with respect to operating plan metrics. Specific areas relating to the status of operating plan metrics are discussed under other headings in this summary.

Review of strategic plan metrics and an assessment of the quality of the data contained in the monthly reports on material statistics:

No issues were identified with respect to strategic plan metrics. The quality of data contained in the monthly reports has been adequate.

Status of the Region's actions to address all open IMPEP review findings and/or open recommendations:

There are no open recommendations from previous IMPEP reviews.

Staffing and training:

The attendees reviewed the Division's staffing plan, along with status of inspector and license reviewer qualifications. The Division is experiencing a changing workload due to new Agreement States decreasing the number of NRC licensees. Resources and vacancies are being closely and appropriately managed by Division management. The Division is investigating strategies to take on new work (e.g, research reactor environmental reviews); it was confirmed that this will not adversely impact the materials program. No concerns with staffing were identified.

The Division uses the qualification program outlined in Inspection Manual Chapter (IMC) 1246, "Formal Qualification Programs in the Nuclear Material Safety and Safeguards Program Area," for the inspection and licensing staff. Generally, staff gets qualified in all areas of the materials program. All staff is currently qualified or partially qualified. The Division plans to do a self-assessment which will include review of qualification documentation before the next IMPEP. The attendees discussed the importance of knowledge management of specialty skills, such as dosimetry and security, when staff are qualified in multiple disciplines. The attendees discussed that as the number of licensees decreases, it will be harder to qualify people under current IMC1246 for each type of license due to fewer on-the-job training opportunities. Training and qualifications of remote workers, an issue to watch from the last IMPEP, has not been an issue, in part because the Division's remote workers are very experienced and independent. The Division is employing technology to involve the remote workers in Division training and meetings. No concerns with qualifications and training were identified.

Program reorganizations:

The Division has not reorganized since the last IMPEP review.

Changes in program budget/funding:

The process for budgeting for new Agreement States was examined.

Materials inspection program:

The Division had 4 overdue inspections of the 276 inspections performed. This equates to less than 2 percent of the inspections being performed overdue, which exceeds the NRC's performance goal of greater than or equal to 98 percent of scheduled inspections being completed within timeliness requirements, and meets the IMPEP criteria for a "satisfactory" rating for this indicator. The Division performed a self assessment regarding the late inspections, implemented recommendations, and has carefully planned work through the Fiscal Year (FY) to ensure the metrics will continue to be met. The attendees discussed NRC revisiting this metric, because it may become disproportionately more difficult to meet given the lower denominator (total number of inspections) resulting from fewer licensees as more States become Agreement States. In terms of the operating plans, the attendees discussed a possible difference between the Division and FSME involving tracking time to exit (30 days for an inspection or 45 days for a team inspection). Division and FSME management will discuss this issue further at the next Regional Counterpart Meeting.

Response to incidents and allegations:

Response to incidents and allegations was not discussed in detail, as FSME and the Division coordinate closely on these areas daily. The attendees discussed incremental improvements to the daily events call, for example to further communicate key activities and milestones.

Review of Regional self-assessments:

The attendees discussed three Regional self-assessments. The self-assessments can be found in NRC's Agencywide Document Access and Management System (ADAMS) using the Accession Numbers ML082760706, ML090910019, ML090050459.

New or potential FSME initiatives that may impact the Regions:

Discussions on ongoing initiatives included security inspections, pre-licensing visits, and working group participation. The Division has begun re-inspection of irradiator and manufacturer and distributor security orders consistent with recent guidance. The Division will rely upon some Agreement States to conduct additional inspections under 274i. Agreements. The Division can accommodate these inspections if the Agreements are not executed. The Division is complying with pre-licensing guidance for site visits and background checks. The Division has instituted a system to track and document these activities beyond the requirements of the guidance. The Region should consider sharing this system with other Regions and the Agreement States. Currently, the Division is participating in a working group to standardize master materials licenses.

CONCLUSIONS:

No performance concerns with respect to the IMPEP criteria were identified.

Schedule for the next IMPEP review:

The next IMPEP review of the Region I radioactive materials program should be held in FY 2010, as currently scheduled.

Action items:

None.