



FSME Procedure Approval

Followup Integrated Materials Performance Evaluation Program (IMPEP) Reviews

SA-119

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NOTE

***Any changes to the procedure will be the responsibility of the FSME Procedure Contact.
Copies of the FSME procedures are available through the NRC website.***



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I. INTRODUCTION

Based on the findings of an Integrated Materials Performance Evaluation Program (IMPEP) review, the Management Review Board (MRB) may direct that a followup IMPEP review take place. This procedure describes the general objectives and process to be followed when conducting followup reviews of the U.S. Nuclear Regulatory Commission (NRC) Regional and Agreement State materials programs under IMPEP, including scheduling, assigning personnel, conducting and reporting the results of the reviews. The scope of the followup review will be dependent on the areas of the program identified as needing improvement.

II. OBJECTIVES

- A. To identify the appropriate individuals responsible for scheduling, conducting, and reporting the results of a followup review.
- B. To define the scope of activities and areas to be examined during a followup review.
- C. To define the methods and the timing for documenting and communicating the results of a followup review to Regional and Agreement State management and the MRB.

III. BACKGROUND

The NRC Regional and Agreement State materials programs are reviewed at least every 4 years under IMPEP, with the option to extend the frequency to 5 years for sustained performance. The MRB may direct that a followup review be conducted prior to the standard 4-year interval. A followup review may be scheduled at the direction of the MRB during or after a period of heightened oversight and will be conducted to evaluate the program's response to previous IMPEP recommendations, and to evaluate the status of any indicator found "satisfactory, but needs improvement" or "unsatisfactory" during the last IMPEP review. A followup review can be used to track the progress of a program, and thus help determine the timing of the next IMPEP review and whether previous indicator findings should be changed and/or whether additional oversight may be needed. During each followup review, the team is also responsible for completing all elements of a Periodic Meeting as described in the Office of Federal and State Materials and Environmental Management Programs (FSME) Procedure SA-116.

IV. ROLES AND RESPONSIBILITIES

FSME is the lead office responsible for coordination of Agreement State and NRC Regional followup IMPEP reviews. Additional information on roles and responsibilities can be found in FSME Procedure SA-100, *Implementation of the Integrated Materials Performance Evaluation Program (IMPEP)*.

A. MRB:

1. Provides direction on the need for a followup review. This is usually determined from the results of a prior IMPEP review or Periodic Meeting.
2. For followup reviews, the roles and responsibilities of the MRB and the guidelines to be followed by the MRB are the same as those detailed in FSME Procedure SA-106, *The Management Review Board*.
3. Provides direction on a course of action to be taken when performance concerns are identified during the followup IMPEP review.

B. Director, FSME:

Acts as, or designates a FSME representative as an MRB member per FSME Procedure SA-106 and concurs on final followup IMPEP reports.

C. Director, Division of Materials Safety and State Agreements (MSSA):

1. Attends Agreement State and Regional IMPEP review exit meetings.
2. Can designate the Deputy Division Director, MSSA, to attend IMPEP review exit meetings.

D. Chief, Agreement State Program Branch (ASPB), FSME:

Transmits the proposed final report of followup reviews to the MRB.

E. IMPEP Project Manager, MSSA:

1. Reviews and provides feedback on all followup IMPEP reports to both the IMPEP team leader and FSME management.
2. Coordinates MRB meetings per FSME Procedure SA-106, as necessary.
3. Reviews each followup IMPEP report for consistency and adequate support of findings.

F. IMPEP Team Leader:

1. Schedules, coordinates and conducts assigned followup IMPEP reviews.
2. Completes the IMPEP report in accordance with Management Directive (MD) 5.6, *Integrated Materials Performance Evaluation Program (IMPEP)*, FSME Procedure SA-106, and this procedure.
3. Designates an IMPEP team member to act as principal reviewer for each applicable performance indicator.
4. Signs draft followup IMPEP reports issued to the Agreement State or Region.
5. Presents review findings at MRB meetings.

G. Regional State Agreements Officer (RSAO):

1. Participates in all IMPEP followup reviews for Agreement States in their assigned Region when such a review is directed by the MRB.
2. Completes the review of their assigned indicator(s) in accordance with the applicable FSME procedures and writes their assigned section(s) of the followup IMPEP report.
3. Ensures the Periodic Meeting portion of the followup IMPEP review is completed and prepares the meeting summary, as necessary.
4. Presents review findings at MRB meetings.

H. IMPEP Team Member:

1. Completes the review of their assigned indicator(s) in accordance with the applicable FSME procedure(s) and writes their assigned section(s) of the followup IMPEP report.
2. Presents review findings at MRB meetings.

V. GUIDANCE

A. Scope of Followup IMPEP Reviews:

1. The followup review will include a complete review of one or more of the common and/or non-common performance indicators since the previous IMPEP review. Normally, these are indicators that resulted in findings of

“satisfactory, but needs improvement” or “unsatisfactory” during the previous IMPEP review. The review team will conduct an evaluation of the program’s response to previous IMPEP review recommendations dealing with these indicators. The team will recommend to the MRB whether these recommendations may be closed, remain open or modified. Additional recommendations for these indicators may also be developed during the followup review.

2. During a followup IMPEP review, a Periodic Meeting will be performed following the meeting agenda in FSME Procedure SA-116, *Periodic Meetings with Agreement States*. The normal scheduling frequency for conducting Periodic Meetings outlined in SA-116 should not be followed.

B. Assignment of Personnel for Followup IMPEP Reviews

1. With the exception of the RSAO, team members should be different from those who conducted the previous IMPEP review.
2. The criteria for selecting team members established in FSME Procedure SA-100 and MD 5.10, *Formal Qualifications for Integrated Materials Performance Evaluation Program (IMPEP) Team Members* should be followed.

C. Scheduling Followup IMPEP Reviews

Followup review scheduling should be completed along with routine scheduling as detailed in FSME Procedure SA-100 and should follow the time frame reflected in the previous final IMPEP report or as directed by the MRB. Followup reviews are normally performed approximately one year following the previous IMPEP review, Periodic Meeting or MRB meeting.

D. Scheduling Letter and Review Questionnaire

1. The team leader should send a letter to the Radiation Control Program Director or the NRC Regional Director, Division of Nuclear Materials Safety (DNMS) at least 90 days prior to the followup review. The letter should reference the discussion which established the review date, detail the dates of the program review, and request the Radiation Control Program Director or the Regional DNMS Director to schedule a closeout meeting of appropriate senior State managers or NRC Regional Administrator for the purpose of discussing the results of the review.
 - a. The exit meeting should take place on the final day of the review.
 - b. Copies of the letter should be sent to the team members, the

IMPEP Project Manager, the ASPB Chief, the NRC Regional State Liaison Officer, the RSAO, and the Division Director, MSSA.

2. The Team Leader and the IMPEP Project Manager should determine whether a questionnaire is necessary. If appropriate, the scheduling letter should include a current IMPEP questionnaire with instructions to address only those sections that apply. In addition to the printed version of the questionnaire, an electronic copy should also be provided. (See sample letters for Agreement State followup IMPEP reviews on the FSME website/IMPEP toolbox).

E. Preparation for Followup IMPEP Reviews

Guidance for review preparation can be found in FSME Procedure SA-100.

F. Entrance Meeting

Guidance for entrance meetings can be found in FSME Procedure SA-100.

G. On-site Review

1. Guidance for conducting the on-site portion of a review can be found in FSME Procedure SA-100. This guidance should be applied to only the specific indicators that are receiving a complete review.

2. Guidance for conducting the other aspects of the followup review can be found in FSME Procedure SA-116.

H. Third Party Attendance in Reviews

Guidance for third party attendance, such as public or media representatives, at reviews can be found in FSME Procedure SA-100.

I. Summarizing Review Findings

Guidance for summarizing review findings can be found in FSME Procedure SA-100.

J. Draft Reports

1. Guidance for preparing the draft report can be found in FSME Procedure SA-100.
2. See sample draft report transmittal letter and boiler plate draft Agreement State followup report on the FSME website/IMPEP toolbox.

- K. Proposed Final Reports, MRB Meetings, Final Reports, and Followup Actions
 - 1. Guidance for preparing and issuing the proposed/final reports and followup actions can be found in FSME Procedure SA-100.
 - 2. Guidance on conducting MRB Meetings can be found in FSME Procedure SA-106.
 - 3. See sample letters for Agreement State followup IMPEP reviews on the FSME website/IMPEP toolbox.

VI. APPENDIX

Appendix A - Frequently Asked Questions

VII. REFERENCES

- 1. NRC Management Directive 5.6, *Integrated Materials Performance Evaluation Program*.
- 2. NRC Management Directive 5.10, *Formal Qualifications for Integrated Materials Performance Evaluation Program (IMPEP) Team Members*.
- 3. FSME Procedure SA-100, *Implementation of the Integrated Materials Performance Evaluation Program (IMPEP)*.
- 4. FSME Procedure SA-106, *The Management Review Board*.
- 5. FSME Procedure SA-116, *Periodic Meetings Between IMPEP Reviews*.
- 6. FSME Procedure SA-122, *Heightened Oversight and Monitoring*.

VII. 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.

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No.	Date	Document Title/Description	Accession Number
1	11/7/02	STP-02-079, Opportunity to Comment on Draft Revisions to STP Procedure SA-119	ML023110511
2	11/7/02	Memorandum to M.Virgilio et al re:Draft STP Procedure SA-119	ML023110521
3	11/7/02	Responses to STP-02-079	ML031740410
4	4/4/03	Summary of Comments on SA-119	ML031710815
5	4/4/03	STP Procedure SA-119, <i>Followup IMPEP Reviews</i>	ML031080582
6	2/22/07	FSME-07-020, Opportunity to Comment 5 Procedures (including SA-119)	ML070570341
7	9/25/07	Summary of Comments on SA-119	ML072610485
8	9/25/07	FSME Procedure SA-119, <i>Followup IMPEP Reviews</i>	ML072540828
9	1/13/12	FSME-12-006, Opportunity to Comment on Draft Revision to FSME Procedure SA-119.	ML113570269

Appendix A

Frequently Asked Questions

Q: If I'm on the review team for a program that is to receive a followup review, will I automatically be on the followup review team?

A: No. Original team members do not come back to participate on the followup review. Only the RSAO for the State is required to participate in the followup review for an Agreement State. New team members are appointed to participate in followup IMPEP reviews since this approach allows for unbiased perspectives on Program past or present performance issues.

Q: Will a followup review always follow a period of Heightened Oversight?

A: Generally, a followup review will follow a period of Heightened Oversight, although the findings of the followup review may not necessarily lead to the end of the Heightened Oversight period.

Q: How long do I need to hold on to my IMPEP review materials once the review is over?

A: Normally, we ask that team members retain their review materials only until the final report is issued. However, if a followup review is scheduled, team members should retain their materials until the followup review report has been issued.

Q: What recommendations can be closed out during a followup review?

A: Any recommendations from previous IMPEP reviews can be closed out if they are fully evaluated during a followup IMPEP review.