

## Region I comments SA-121

- Section I. Introduction
  - Change the second sentence to read: “The MRB provides a senior-level management review of the Integrated Materials Performance Evaluation Program (IMPEP) review team’s findings and recommendations.”
- Section II. Objectives
  - Change A. to read: “To provide guidance to the Organization of Agreement States (OAS) on the coordination and participation of the Agreement State Liaisons in MRB meetings.”
  - Change B. to read: “To provide guidance to the Office of Federal and State Materials and Environmental Management Programs (FSME) staff on coordination of the Agreement State Liaisons to the MRB.”
- Section III. Background
  - Change A. to read: “It is the policy of the NRC to evaluate the NRC’s regional materials, sealed source and device (SS&D), and fuel cycle programs and Agreement State radiation control programs in an integrated manner. Guidelines for IMPEP...”
  - Change B. to read: “The MRB makes the overall assessment of each NRC regional materials, SS&D, fuel cycle or Agreement State program on the basis of the findings and recommendations in the proposed final IMPEP report prepared by the IMPEP team that conducted the review. The guidelines for conducting MRB meetings and issuing findings for IMPEP reviews are outlined in FSME Procedure SA-106, *The Management Review Board*.”
- Section IV. Roles and Responsibilities
  - Change A. 1. to read: “Designates an OAS board member (OAS Designee) to be responsible for the coordination and participation of the Agreement State Liaisons.” (Note: removed “with the IMPEP project manager” since IV. B. talks about this designee’s roles and responsibilities)
  - Unsure as to the meaning of the sentence in A.2. Suggest changing A. 2. to read: “Approves Agreement State Liaison recommendations once each volunteer has received their management’s approval.”
  - Change B. 1. to read: “Compiles a list of interested Agreement State staff who meet the criteria to serve as a liaison to the MRB as listed in FSME Procedure SA-106 and coordinates an individual’s participation with the IMPEP project manager;”
  - Suggest removing B. 4. This has not been past practice for follow-up reviews. If the OAS wants to use the same liaison that was used for the IMPEP review that led to the follow-up then that should be the choice of the OAS board and should not be mandated by a procedure. Also the beginning of B. 4. is covered by B. 3.
  - Change B. 5. to read: “Addresses any issues or concerns raised by the Agreement State liaison, as a result of participation on the MRB, with the IMPEP Project Manager; and”

- Suggest removing the newly added B.6. While we agree that if an Agreement State has concerns or feedback regarding an IMPEP review or members of the IMPEP review team they should communicate it through the OAS designee, we do not believe that this role and responsibility should be located in this procedure. This procedure is about the coordination and participation of the Agreement State Liaison to the MRB. This role and responsibility may be better suited for FSME Procedure SA-100 or SA-120.
- Change C. 1. to read: “Designates a point of contact for the OAS Designee; and”
- Suggest removal of E. 3. It is very rare that an individual participating as the Agreement State Liaison to the MRB will cover more than 1 MRB in a given year let alone several MRB’s. We believe that this role and responsibility is misleading and should be removed.
- Add a new entry that states: “Meets the requirements in FSME Procedure SA-106.”
- Section V. Guidance
  - Change A. 2. to read: “Since the MRB schedule is coordinated with the Program being reviewed, the date will be established ...” (This change is requested to encompass not only NRC regional materials and Agreement State programs but also SS&D and fuel cycle program reviews)
  - Remove “B.1.” as there is only one item discussed in subsection B. Change subsection B to read: “The Agreement State Liaison to the MRB serves as a conduit for all Agreement States wishing to express thoughts or concerns about a particular IMPEP review for the MRB’s consideration. The Agreement State Liaison should provide comments and feedback during the MRB meeting on behalf of the OAS and not a particular Agreement State.”
  - Suggest adding another point to V. A. regarding when the Agreement State Liaison can expect to receive the proposed final IMPEP report.
- Section VIII. ADAMS Reference Documents
  - This section needs to be added to this procedure.
- **General Comment**
  - Region I would like to recommend consideration of incorporating SA-121 into SA-106 (The Management Review Board). Since SA-106 already talks about the Agreement State Liaison to the Management Review Board and the Agreement State Liaison is part of the Management Review Board it is duplicative to have a separate procedure for that one position.