



Office of Nuclear Materials Safety and Safeguards Procedure Approval

ADMINISTRATIVE PROCESS UNDER THE INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM (IMPEP)

AD-600

Issue Date:

Review Date:

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Date:

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Date:

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Date:

ML15238A441

NOTE

Any changes to this procedure will be the responsibility of the Procedure Contact. Copies of the Office of Nuclear Material Safety and Safeguards (NMSS) procedures will be available through the U.S. Nuclear Regulatory Commission website.

I. INTRODUCTION

This document provides guidance for the administrative process involved in the preparation and management of documents relating to the Integrated Materials Performance Evaluation Program (IMPEP).

II. OBJECTIVES

To provide guidance to the Office of Nuclear Material Safety and Safeguards (NMSS) on the administrative process of IMPEP. Support will be provided by the IMPEP administrative coordinator from the Division of Materials, Safety, State, Tribal, and Rulemaking Programs (MSTR), Agreement State Programs Branch (ASPB). When the IMPEP Team Leader is from an U.S. Nuclear Regulatory Commission (NRC) region or another NRC program office other than NMSS, additional administrative coordination with NMSS may be needed.

III. BACKGROUND

It is the policy of the NRC to evaluate the NRC regional and Agreement State radioactive materials programs in an integrated manner. The IMPEP Team Leader receives assistance from administrative staff assigned to provide assistance for the IMPEP review.

IV. ROLES AND RESPONSIBILITIES

A. MSTR Director:

Approves the Annual IMPEP Review Schedule and the list of IMPEP team members.

B. ASPB Chief:

1. Designates the IMPEP Project Manager.
2. Reviews Annual IMPEP Review Schedule and the list of IMPEP team members.
3. Signs the Draft IMPEP Reports.
4. Signs the Proposed Final IMPEP Reports.

C. IMPEP Project Manager:

1. Prepares the Annual IMPEP Review Schedule, and assigns IMPEP team members.
2. Works in conjunction with the IMPEP Administrative Coordinator to ensure that all IMPEP-related activities including those outlined in Section IV.D.1-10 are carried out in a manner that supports the IMPEP reviews.

3. Reviews and provides feedback on all versions of IMPEP reports to both the IMPEP team leader, ASPB Chief, and MSTR management.

D. IMPEP Administrative Coordinator:

1. Proofreads all the IMPEP reports for proper grammar and format, and ensures reports are prepared in accordance with the agency standards.
2. Verifies that IMPEP related reports and other supporting documents are correct (e.g. final report is not titled "Proposed" and name of state is correct wherever it appears) and are distributed, either in paper copy or electronic e-mail copy to the appropriate individuals in the State, the designated State Liaison Officer (SLO), the IMPEP review team leader and the team members, the Office of the Executive Director for Operations (OEDO), the appropriate individuals in NMSS, and the Office of the General Counsel (OGC).
3. Profiles and posts all IMPEP related correspondence in the Agencywide Documents Access and Management System (ADAMS), including the IMPEP review scheduling letter and questionnaire, the IMPEP reports (draft, proposed final and final versions), the Management Review Board (MRB) public meeting notice, the MRB meeting minutes, and the acknowledgment letter if a response to the Final IMPEP report is requested.
4. Schedules all MRB meetings, including special MRB meetings for periodic meetings, and IMPEP self-assessments.
5. Coordinates participation of the MRB members, Agreement State program management, IMPEP review team members, and members of the public at MRB meetings. Arranges for videoconferencing, bridge numbers, and conference rooms, as appropriate, for the MRB meetings.
6. Requests NMSS ticket number from the NMSS front office through email to RidsNmssOdResource@nrc.gov for the Final IMPEP Report. Prepares Final IMPEP Report for concurrence in accordance to NMSS procedures.
7. Distributes the final IMPEP report, periodic meeting summaries, and MRB meeting minutes to the external website contractor point of contact to be posted on NMSS's web site. Distributes all IMPEP related documents to the appropriate addressees.
8. Provides relevant correspondence (i.e., proposed final reports, responses to draft reports, organization charts, briefing material, and meeting agendas), as appropriate, to the MRB members, the review team, and other attendees at least 7 days in advance of the MRB meeting.

9. Ensures that public meeting notices for MRB meetings are prepared, and posted to the Public Meeting Notice System (PMNS) at least 10 days prior to the meeting date.
10. Prepares and issues minutes of MRB meetings, or assigns to another person.
 - a. The minutes should summarize major discussions, but should not be a verbatim account of the proceedings. Transcription and/or recording services can be used if directed.
 - b. The minutes should clearly document the underlying causes for program performance issues, precedents established by the MRB, and good practices.
 - c. The meeting minutes should document the meeting attendees.

V. PROCESS FOR SCHEDULING MRB MEETINGS

- A. At some point prior to the onsite IMPEP review (weeks to months), the IMPEP Administrative Coordinator will consult with the Deputy Executive Director for Operations for Materials, Waste, Research, State, Tribal, Compliance, Administration, and Human Capital Programs (DEDM); including the DEDM's calendar and administrative staff, to choose a date to hold the MRB. It should be from 74 to 90 days following completion of the onsite review.
- B. The IMPEP Administrative Coordinator will offer potential dates (minimum of two) to the IMPEP Team Leader and program manager. The availability of the DEDM, team leader, and State Program Manager determines the MRB date selected.
- C. Upon selection of the MRB date, the IMPEP Administrative Coordinator will contact the appropriate administrative assistants within NMSS, OCG, the appropriate NRC Region and OAS to invite the MRB members to the meeting. Careful consideration should be given to achieving balance in the number of MRBs the Regional Administrator/Deputy Regional Administrator (RA/DRA) of any one region is required to support. Note: If the RA or DRA from the requested region is not available, then the IMPEP Administrative Coordinator will try another region. In the event no RAs and DRAs are available, the MRB position can be delegated to the regional Division of Nuclear Material Safety Director/Deputy. If there is an issue with the availability of an RA or DRA, the IMPEP Administrative Coordinator should resolve it with the Regional Administrator's administrative assistants or contact the ASPB Branch Chief if needed.
- D. Announcement of the public meeting will be added to the PMNS system (<https://adamsicm.nrc.gov/pmns>) and listed as category 1, once the selection is finalized for the MRB date. Agendas will include the ADAMS ML number, if the document is final (e.g., periodic meeting summary).

- E. If the subject meeting documents are draft or proposed and the MRB serves to finalize these documents, such as IMPEP reports, meeting minutes as well as the final documents are distributed to the meeting addressees and posted to the external website. If the subject meeting documents are already finalized before the MRB meeting, such as, periodic meeting summaries, the minutes will be posted to the external website only.

VI. GUIDANCE

The following documents are to be profiled in ADAMS and distributed by the IMPEP Administrative Coordinator and/or the appropriate Region's administrative staff. In order to ensure consistency, this procedure establishes naming conventions for the Microsoft documents, ADAMS profile templating (NMSS-001, Appendix A), and distribution instructions (both paper copy and electronic e-mail versions). In addition, all IMPEP documents are organized within ADAMS by fiscal year and by Program.

A. Scheduling Letter and Questionnaire

Scheduling Letter with IMPEP Questionnaire mailed to State via regular mail and e-mail.

Distribution: Letter Addressee, IMPEP Team Leader and members, IMPEP Project Manager, ASPB Chief, MSTR management, and Regional State Agreements Officer (RSAO).

B. IMPEP Questionnaire Response from State

State returns Questionnaire to IMPEP Team Leader. The IMPEP Team Leader reviews for completeness, performs the Sensitive Unclassified Non-Safeguards Information (SUNSI) review, and confirms that the document is put into ADAMS by the IMPEP Administrative Coordinator and/or the Region's administrative staff.

Distribution: IMPEP Team Leader and members, IMPEP Project Manager, ASPB Chief, MSTR management, and RSAO.

C. Organization Charts Received from State

State submits organization charts in Questionnaire response or at the IMPEP review. IMPEP Team Leader ensures that the document is put into ADAMS by the IMPEP Administrative Coordinator and/or the Region's administrative staff, as a separate document.

Distribution: IMPEP Team Leader and members, IMPEP Project Manager, ASPB Chief, and RSAO.

D. Draft IMPEP Report

The Draft IMPEP Report is prepared and concurred on by the IMPEP Team

Leader in accordance with ¹FSME Procedure SA-100, *Implementation of the Integrated Materials Performance Evaluation Program*. The ASPB Chief signs the draft report. IMPEP team leader also performs the SUNSI review. IMPEP Administrative Coordinator is responsible for typing, proofreading, profiling in ADAMS, and distributing this document.

Distribution: Letter Addressee, IMPEP Team Leader and members, IMPEP Project Manager, ASPB Chief, MSTR management, RSAO, SLO, and the State Radiation Control Program Director, if appropriate.

E. State Response to Draft IMPEP Report

State returns the response to the Draft IMPEP Report to the IMPEP Team Leader. IMPEP Team Leader ensures that the document is put into ADAMS by the IMPEP Administrative Coordinator.

Distribution: IMPEP Team Leader and members, IMPEP Project Manager, ASPB Chief, MSTR management, and RSAO.

F. Proposed Final IMPEP Report

IMPEP Project Manager and IMPEP Team Leader revise the Draft IMPEP Report to reflect the State's response, and the report is then issued as the Proposed Final IMPEP Report. The ASPB Chief signs the Proposed Final Report. The IMPEP Project Manager also performs the SUNSI review. IMPEP Administrative Coordinator is responsible for typing, proofreading, profiling in ADAMS, and distributing this document.

Distribution: MRB members, IMPEP Team Leader and members, IMPEP Project Manager, MSTR management, ASPB Chief, RSAO, OEDO Technical Assistant, and the Organization of Agreement States (OAS) Liaison to the MRB.

G. MRB Meeting Minutes

The IMPEP Administrative Coordinator, IMPEP Project Manager, or designee takes the minutes at the MRB meeting. The IMPEP Administrative Coordinator circulates the minutes for review by the IMPEP Team Leader and the IMPEP

¹ Note that the Office of Federal and State Materials and Environmental Management Programs (FSME) merged with NMSS on October 6, 2014. Not all State procedures have been updated to reflect the new office name of NMSS. In the interim, current procedures are still in effect and will be referenced as FSME State Procedures until such time as they are reviewed and revised to include the official office name. All procedures may be found on the NMSS external website under "Resources and Tools," and then "NMSS Procedures."

Project Manager. The IMPEP Administrative Coordinator is responsible for typing, proofreading, profiling in ADAMS, and distributing this document.

Distribution: MRB Members, IMPEP Team Leader, IMPEP Project Manager, ASPB Chief, RSAO, State Radiation Control Program Director, and OAS Liaison to the MRB.

H. Final IMPEP Report

Final IMPEP Report is coordinated by the IMPEP Team Leader and the IMPEP Project Manager by revising the Proposed Final IMPEP Report to reflect the actions recommended by the MRB. The IMPEP Administrative Coordinator is responsible for typing, proofreading, profiling in ADAMS, and distributing this document. The Final IMPEP Report is signed by the DEDM, OEDO.

Distribution: MRB Members, IMPEP Team Leader and members, IMPEP Project Manager, MSTR management, ASPB Chief, RSAO, OEDO Technical Assistant.

I. Periodic Meeting Summary

The periodic meeting summary is prepared, finalized and signed by the meeting lead within 30 days of the date of the meeting. The meeting summary should reflect the outcomes of the meeting.

Distribution: Letter Addressee, IMPEP Project Manager, ASPB Chief, MSTR management, IMPEP Administrative Coordinator, RSAO, and Region DNMS management.

J. Probation, Heighten Oversight and Monitoring Conference Call summary

The probation, heighten oversight, and monitoring call summaries are prepared and finalized by the meeting lead within 30 days of the date of the call. Summaries should reflect status updates and outcomes of the calls.

Distribution: Program Attendee, IMPEP Project Manager, ASPB Chief, MSTR management, IMPEP Administrative Coordinator, and Region DNMS management.

VII. APPENDIX

Appendix A: ADAMS Profiling Template – NMSS-001 (ML16070A246)

VIII. REFERENCES

FSME Procedure SA-100, *Implementation of the Integrated Materials Performance Evaluation Program*

IX. 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 NRC's ADAMS are listed below.

No.	Date	Document Title/Description	Accession Number
1	8/31/06	STP Procedure AD-600	ML062730009
2	3/22/10	FSME Procedure AD-600	ML100430025

APPENDIX A

DOCUMENT TYPE SUMMARY

NMSS-001

DOCUMENT TYPE: Integrated Material Performance Evaluation Program (IMPEP) Documents.

****Scheduling Letter & Questionnaire, Draft Report, NRC Acknowledgement of State Response on Final Report, Periodic Meeting Scheduling Letter, Periodic Meeting Summary, All Other Periodic Meeting Materials/Documents, State Response to Questionnaire, State Organizational Charts, State Response to Draft Report, Proposed Final Report, MRB Meeting Minutes, Special MRB Memorandum, Final Report and State Response to Final Report****

Special Instructions:

This template is to be used by the DPC and staff when processing Integrated Material Performance Evaluation Program (IMPEP) documents prepared by the Office of Nuclear Material Safety and Safeguards (NMSS) or incoming documents to NMSS that meet the requirements of an Official Agency Record, into ADAMS.

DOCUMENTS TO BE ADDED IN ADAMS FOLDER: **NMSS-MSTR-ASPB-IMPEP (when possible)**, and under the current fiscal year

Profile Field Requirements for the DPC:

Item ID	System Assigned
Accession No.	System Assigned
Estimated Page Count	<u>DPC Enter:</u> Actual number of pages of file
Document Date	DPC will input date printed/stamped on document. Format is: MM/DD/YYYY
Document Type	Entered by NMSS and/or Region Integrated Material Performance Evaluation Program (IMPEP)-Agreement States And Other document types that apply, e.g., Letter, E-mail, Memo.
Availability	Entered by NMSS and/or Region
Title	Entered by NMSS and/or Region (example titles listed below) DPC Will Not Change
Author Name	Name of person who signed cover letter
Author Affiliation	Affiliation of person who signed cover letter
Addressee Name	Name of person cover letter is addressed to
Addressee Affiliation	Affiliation of person cover letter is addressed to

Docket No.	
License No.	
Case/Reference No.	
Document/Report Number	
Keyword	Entered by NMSS and/or Region “NMSS-001” “DPC - Do Not Change Title” “SUNSI Review Complete” if Publicly Available Item Code (e.g., MD 3.4 Non-Public B.1) if Non-Publicly Available Note: Press <i>Enter</i> after each entry
Document Date Received	
Date Docketed	
Comment	Entered by NMSS and/or Region LAN ID of person entering document into ADAMS and KNM1 DPC will not add any value to this field
Vital Records Category	System Assigned
Document Status	
Media Type	Electronic
Physical File Location	ADAMS
FACA Document	No
Date To Be Released	Entered by NMSS and/or Region if Publicly Available
Distribution List Codes	Entered by NMSS and/or Region if applicable
Contact Person	Entered by NMSS and/or Region
Text Source Flag	Entered by NMSS and/or Region: Native Application
Official Record	System Assigned
Document Sensitivity	Entered by NMSS and/or Region

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SAMPLE FORMAT OF TITLES FOR ADAMS

(Spell out the State, do not use abbreviations)

[MM/DD/YEAR] Letter to [1st Initial. Last Name] re: [State] IMPEP Scheduling Letter and Questionnaire for [Month YEAR (month of IMPEP review)].

[MM/DD/YEAR] [State] Response to [YEAR (FY of IMPEP)] IMPEP Questionnaire [YEAR] [State] Organizational Charts.

[MM/DD/YEAR] Letter to [1st Initial. Last Name] re: [State] [YEAR] IMPEP Draft Report.

[MM/DD/YEAR] Letter (or Email) from [1st Initial. Last Name] re: [State] Response to the Draft IMPEP Report.

[MM/DD/YEAR] Comment Resolution to [State] [YEAR] Draft IMPEP Report.

[MM/DD/YEAR] Memo to Management Review Board re: the [State] [YEAR] Proposed Final IMPEP Report.

[MM/DD/YEAR] Letter to [1st Initial. Last Name] re: [State] [YEAR] Final IMPEP Report.
(This is the same for the Package and Letter)

[MM/DD/YEAR] Memo to Management Review Board - Minutes: [Date of MRB] [State] IMPEP MRB Meeting.

[MM/DD/YEAR] Letter to [1st Initial. Last Name] re: Scheduling Letter for [State] FY [YEAR] Periodic Meeting.

[MM/DD/YEAR] Memo to Management Review Board re: Special MRB Meeting with the [State(s)] Agreement State Program(s).

[MM/DD/YEAR] Memo to Management Review Board - Minutes: [Date of MRB] Special IMPEP MRB Meeting.

[MM/DD/YEAR] Letter to [1st Initial. Last Name] re: Invitational to Participate on the [State] [FY YEAR] IMPEP Review Team.

[MM/DD/YEAR] [State] Quarterly Monitoring Call Summary.

[MM/DD/YEAR] [State] Bi-Monthly Heightened Oversight Call Summary.

[MM/DD/YEAR] Letter to [1st Initial. Last Name] re: Support to the [State] Agreement State Program.

[MM/DD/YEAR] Email from [1st Initial. Last Name] re: [State] Updated Performance Improvement Plan (PIP).