

**Comment Resolution Document  
external comments**

**Summary of Comments for *Interim SA-101, Reviewing the Non-Common Performance Indicator, Status of Materials Inspection Program***

Sent to the Agreement States, NRC NMSS, NRC Regions I, III, and IV for Comment in STC-19-079, December 18, 2019

Comment No.	Source	Location	Comment	Accepted	Remarks
1	J. Goodman; NJ	III Background	“In order to determine this information, the capability for maintaining and retrieving statistical data on the status of an inspection program must exist”. <i>Why was this [sentence] deleted, isn't this true?</i>	Yes	Yes, it is true. However, it's not <i>background</i> information (nor is it particularly useful sentence, in retrospect). Another commenter made a similar point and I believe I have satisfied your point(s) in section V.B.2 a. & b. Procedure revised accordingly.
2	J. Goodman; NJ	V. B. 3. e. Page 5 of 9	Highlighted the words ‘a reasonable attempt’ <i>I don't understand what would prevent a reviewer from using the frequencies in MC2800.</i>	Yes	The reviewer would use the frequencies in IMC 2800 . If the AS Program uses different definitions, they will be noted in the IMPEP report. Appendix B Question 5 provides additional guidance. Procedure revised accordingly.

3	J. Goodman; NJ	General	<i>If the reviewer is just using a subset of inspection reports issued during the review period and it is of concern, e.g. 60% are over the Program's time period, then the Program should be given a chance to produce all inspection report statistics for the review period. The selected reports may have not been representative of the Program's overall performance.</i>	No	Agreed. However, the reviewer would not be using a 'subset of inspection reports' to make this determination. The reviewer would have to use all the inspection reports issued during the review period to make an objective judgement regarding overall performance. Appendix B Q7 addresses this question. No change made as a result of this comment.
4	J. Goodman; NJ	Appendix A 1.d.	<i>What if they still do not have material after 18 months?</i>	N/A	For licensees which do not possess licensed material or have not engaged in principal activities, they would be inspected in accordance with IMC 2800 section 05.02 Initial Inspection section b. page 14. No change made as a result of this comment.
5	J. Goodman; NJ	Appendix A 2	Inspections are always compared to NRC Priorities in IMC 2800 rather than the Program's internal inspection frequencies	Yes	Comment Incorporated. Procedure revised accordingly.
6	P.Peterson; CO	General	While we understand that the revision and authoring of these procedures is a multi-organization process involving many individuals,	Yes	Efforts have been taken to address these differences.

			when looking at the collection there seems to be a multitude of different voices and writing styles and as a result it lacks uniformity.		
7	P.Peterson; CO	General	Specifically, it appears that many of the appendices address common items and it would be appropriate to use common titles for the appendices and to keep them in a common order if possible.	Yes	Please note that most of the appendices in the interim procedures (i.e., the "Examples of Less than Satisfactory Findings of Program Performance" from the common and non-common IMPEP performance indicators; the casework summary sheets, and inspector accompaniment summary sheets, will be posted on the IMPEP toolbox at: <a href="https://scp.nrc.gov/impeptools.html">https://scp.nrc.gov/impeptools.html</a> ) have been removed and will be placed on the SCP Web site to allow for dynamic revisions.
8	P.Peterson; CO	General	Additionally, during the drafting process the idea of consistency within these procedures regarding the phrase "Agreement State or NRC..." vs. "NRC or Agreement State..." was discussed. This should be made uniform throughout the procedures.	Yes	Comment Incorporated. Agreement State comes first. Procedure revised accordingly.