

CRITERIA AND EXAMPLES OF RECOMMENDATIONS

When the team identifies performance deficiencies that have resulted in a programmatic weakness, the team should seek to identify the root cause of the issue and consider providing recommendations for corrective actions based on the root cause. Recommendations should relate directly to program performance, be constructive, promote improvement, focus on the root cause of the weakness, and should be performance based. The team should consult with program management to ensure that the goal of the recommendation, as written, is understood and implementable.

The following examples are recommendations approved by the MRB in previous IMPEP reports. The purpose of the examples is to assist in the development of recommendations by the IMPEP team:

- The team recommends that the [radiation control program] create a formal training qualification program equivalent to Inspection Manual Chapter 1248 and apply it to new staff and staff currently going through the qualification process.
- The team recommends that the [radiation control program] revise its licensing procedures to include the essential objectives of the NRC's Pre-Licensing guidance, that the revised guidance be applied to all new applications and transfers of control, and provide its staff with training on the revised procedures.
- The team recommends that the [radiation control program] establish and implement a system to track incident and allegation investigations to ensure timeliness, proper documentation, appropriate follow up, and closure.
- The team recommends that the [radiation control program] formalize the SS&D procedures for: the review of applications; the proper use of checklists; handling of proprietary information; full control of records; incorporating regulations and policies as legally binding requirements; and the requirement for signatures by two qualified reviewers.
- The team recommends that the uranium recovery program provide written results of team inspections and site visits to all licensees within 45 days of the completion of the inspection in accordance with IMC 610.