

Integrated Materials Performance Evaluation Program (IMPEP)

Under Section 274 of the Atomic Energy Act of 1954, as amended, the United States Nuclear Regulatory Commission (NRC) retains oversight authority for ensuring that Agreement State programs provide adequate protection of public health and safety and are compatible with the NRC's regulatory program. In fulfilling this statutory responsibility, the NRC will periodically review the program to ensure it continues to be adequate and compatible after an agreement becomes effective.

To fulfill this responsibility, the NRC, in cooperation with the Agreement States, established and implemented the Integrated Materials Performance Evaluation Program (IMPEP). IMPEP is a performance evaluation process that provides the NRC and Agreement States with systematic, integrated, and reliable evaluations of the strengths and weaknesses of their respective radiation control programs and identification of areas needing improvement. IMPEP reviews are currently conducted in accordance with the [Agreement State Program Policy Statement](#), published in the Federal Register on October 18, 2017 (82 FR 48535), and described in [Management Directive 5.6](#) "Integrated Materials Performance Evaluation Program (IMPEP)" and NMSS Procedure [SA-100](#) "Implementation of the Integrated Materials Performance Evaluation Program (IMPEP)".

The Office of Nuclear Material Safety and Safeguards (NMSS) is the lead office responsible for the implementation of IMPEP. Approximately 10-12 reviews are conducted each year. The Agreement States and NRC radiation control programs are routinely reviewed every 4 years, although the timeline may be adjusted based on performance and other exceptional circumstances (e.g., public health emergency).

The IMPEP process employs a team of Agreement State and NRC staff to assess both Agreement State and NRC radiation control licensing and inspection programs. All reviews use the following common indicators in the assessment and place primary emphasis on performance:

- Technical Staffing and Training
- Status of Materials Inspection Program
- Technical Quality of Inspections
- Technical Quality of Licensing Actions
- Technical Quality of Incident and Allegation Activities

Additional areas are identified as non-common performance indicators (i.e., Legislation, Regulations, and Other Program Elements; Sealed Source and Device Evaluation Program; Low-Level Radioactive Waste Disposal Program; and Uranium Recovery Program) and may also be addressed in the assessment.

The range of possible findings for an Agreement State program is as follows:

1. Adequate to protect the public health and safety and compatible/not compatible
2. Adequate, but needs improvement and compatible/not compatible
3. Inadequate to protect public health and safety and compatible/not compatible

The NRC radiation control program is rated in the same manner, but without the performance indicator Legislation, Regulations, and Other Program Elements and the compatibility finding.

The Management Review Board (MRB), comprised of senior NRC staff and an Agreement State representative provided by the Organization of Agreement States to make a determination of program adequacy and compatibility. The MRB provides a senior-level review of the IMPEP team's findings and recommendations. The MRB chair has the final decision-making authority and issues the final NRC findings to the radiation control program. These findings can include decisions regarding enhanced oversight of the program.