



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

April 13, 2021

MEMORANDUM TO: Chairman Hanson  
Commissioner Baran  
Commissioner Caputo  
Commissioner Wright

A handwritten signature in blue ink, appearing to be "J. Lubinski".

Signed by Lubinski, John  
on 04/13/21

FROM: John W. Lubinski, Director  
Office of Nuclear Material Safety  
and Safeguards

SUBJECT: ANNUAL REPORT ON AGREEMENT STATES' AND U.S. NUCLEAR  
REGULATORY COMMISSION'S RADIOACTIVE MATERIALS  
PROGRAMS FOR CALENDAR YEAR 2020

Enclosed is the annual report to inform the Commission of the status of the Agreement States' and U.S. Nuclear Regulatory Commission's radioactive materials programs. This report was developed in accordance with the June 30, 1997, Staff Requirements Memorandum on SECY-97-054, "Final Recommendations on Policy Statement and Implementing Procedures for: 'Statement of Principles and Policy for the Agreement State Program' and 'Policy Statement on Adequacy and Compatibility of Agreement State Programs.'"

Enclosure:  
Annual Report on Agreement States' and  
U.S. Nuclear Regulatory Commission's  
Radioactive Materials Programs for  
Calendar Year 2020

cc: SECY  
OGC  
OCA  
OPA CFO  
EDO

CONTACT: Robert K. Johnson, NMSS/MSST  
301-415-7314

SUBJECT: ANNUAL REPORT ON AGREEMENT STATES' AND U.S. NUCLEAR  
REGULATORY COMMISSION'S RADIOACTIVE MATERIALS PROGRAMS  
FOR CALENDAR YEAR 2020 – DATE April 13, 2021

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**ANNUAL REPORT ON AGREEMENT STATES' AND U.S. NUCLEAR REGULATORY  
COMMISSION'S RADIOACTIVE MATERIALS PROGRAMS FOR CALENDAR YEAR 2020**

**April 13, 2021**

## EXECUTIVE SUMMARY

This report summarizes Agreement State and U.S. Nuclear Regulatory Commission (NRC) radioactive materials program performance, including the ability to: (1) provide reasonable assurance of adequate protection of public health and safety, for the safe and secure use of nuclear materials; medical, industrial, and academic applications; uranium recovery activities, low-level radioactive waste sites, and (2) maintain Agreement State programs that are compatible with the NRC's regulatory program.

The NRC verifies the program performance using the Integrated Materials Performance Evaluation Program (IMPEP). Agreement State and NRC programs are determined to be adequate to protect public health and safety if the administration of these programs ensures adequate protection of public health and safety in regulating the use of radioactive material. Overall, the Agreement State and NRC programs (referred to as the National Materials Program (NMP)) continue to provide reasonable assurance of adequate protection of public health and safety.

The NMP's performance, as measured by the IMPEP, has been consistently strong. During Calendar Year (CY) 2020, 35 of the 39 Agreement State programs had an adequacy finding of adequate to protect public health and safety. The four remaining Agreement States—Florida, Kansas, Mississippi, and Rhode Island— had adequacy findings of adequate to protect public health and safety, but needs improvement. No States had a finding of not adequate to protect public health and safety. All NRC programs (NRC Sealed Source and Device and NRC Regions I, III, and IV materials programs) remained adequate to protect public health and safety. In January 2020, the NRC made the decision to evaluate the NRC materials programs as a single entity under the IMPEP, beginning in 2021. The first consolidated NRC IMPEP review is scheduled to take place in June 2021.

Regarding Agreement State compatibility, 37 of the 39 programs had a compatibility finding of compatible with the NRC's regulatory program. The two remaining Agreement States—Florida and New York— had compatibility findings of not compatible with the NRC's regulatory program.

All programs that have IMPEP findings are taking actions to address the issues and the effectiveness of those actions will be reviewed through the IMPEP process.

The CY 2020 IMPEP results demonstrate that the NMP remains protective of public health and safety in regulating the use of radioactive material. Agreement States continue to play a valuable role in the IMPEP, as evidenced by the increase in Agreement State participation and collaboration in the NMP activities. The NRC and its regulatory partners continue to effectively implement the program in a flexible, resilient, and innovative manner to accomplish our mission, despite challenges presented by the ongoing Coronavirus Disease 2019 Public Health Emergency. The NRC staff will continue to monitor performance through the IMPEP and work with the NMP to address any performance issues or trends.

## **BACKGROUND ON THE NRC AGREEMENT STATE PROGRAM**

Section 274 of the Atomic Energy Act of 1954, as amended (AEA), provides broad authority for the U.S. Nuclear Regulatory Commission (NRC) to establish a unique Federal and State relationship in the administration of regulatory programs to provide reasonable assurance of adequate protection of public health and safety in the industrial, medical, commercial, and research uses of agreement material (source, byproduct, and small quantities of special nuclear material as identified by Section 274b. of the AEA). Subsection 274b. of the AEA authorizes the NRC to enter into an agreement by which the NRC relinquishes its regulatory authority and the State assumes regulatory authority over some or all of these materials. In order to discontinue its authority, the NRC must find that the State program is adequate to protect public health and safety and compatible with the NRC program for the regulation of agreement material. The NRC also has an obligation, pursuant to Subsection 274j. of the AEA, to periodically review existing Agreement State program performance to ensure continued adequacy and compatibility.

## **PERFORMANCE MONITORING**

The NRC uses the Integrated Materials Performance Evaluation Program (IMPEP) to periodically review Agreement State and NRC programs (referred to as the National Materials Program (NMP)) to verify that these programs are adequate to protect public health and safety, and verify that Agreement State programs are compatible with the areas of the NRC's regulatory program.

Programs are determined to be adequate to protect public health and safety if the administration of these programs provides reasonable assurance of the protection of public health and safety in regulating the use of radioactive material. Adequacy findings under IMPEP result in one of three conclusions: (1) adequate to protect public health and safety; (2) adequate to protect public health and safety, but needs improvement; or (3) not adequate to protect public health and safety.

When the NRC promulgates regulations, it determines the degree to which Agreement States regulations must be compatible with the NRC's regulations. Agreement State programs are determined to be compatible with the NRC's regulatory program when Agreement State programs regulations align with this determination, and therefore do not create conflicts, duplications, gaps, or other conditions that jeopardize an orderly pattern in the regulation of agreement material. The IMPEP review compatibility findings for Agreement State programs are either compatible or not compatible.

The frequency of IMPEP reviews range from 1 to 5 years, based on the program's performance. All reviews are conducted in accordance with the NRC Management Directive 5.6, "Integrated Materials Performance Evaluation Program (IMPEP)," and are conducted by teams of NRC and Agreement State staff members. A Management Review Board (MRB), composed of senior NRC managers and an Organization of Agreement States representative, convenes to deliberate the adequacy and compatibility findings and the frequency and type of the next IMPEP review. The MRB Chair has the final decision-making authority and issues the final NRC findings to the radiation control program based on input from the IMPEP review team, MRB members, and the program being reviewed. The NRC also conducts Periodic Meetings between the IMPEP reviews to remain knowledgeable of the status of Agreement State and NRC programs.

The NRC takes a graded approach to address programmatic weaknesses in Agreement State programs. Program improvement measures may include monitoring, heightened oversight, probation, or suspension. Under these processes, the NRC staff works collaboratively with the Agreement States to ensure that they have a full understanding of the issues that need to be addressed, and that appropriate corrective actions are implemented in order to progress toward reestablishing satisfactory program performance.

The NRC, in collaboration with its Agreement State partners, updated the foundational document for IMPEP, Management Directive 5.6, “Integrated Materials Performance Evaluation Program (IMPEP)” (Agencywide Documents Access Management System (ADAMS) Accession No. [ML19213A024](#)), in July 2019, and subsequently revised 13 State Agreements IMPEP related procedures in September 2020. The revised procedures were implemented in the five IMPEP reviews conducted in Calendar Year (CY) 2020. In January 2020, the MRB Chair also made the determination that the NRC materials programs will be evaluated as a single entity under IMPEP, beginning in Fiscal Year 2021 (ADAMS Accession No. [ML19331A856](#)). This change stems from a recommendation from the June 2018 IMPEP self-assessment report entitled “Focused Self-Assessment of the Integrated Materials Performance Evaluation Program (IMPEP)” (ADAMS Accession No. [ML17187A100](#)). Currently, IMPEP assesses NRC’s regional materials programs and the Sealed Source & Device Evaluation Program as separate entities. Evaluating the NRC materials program as a single entity under IMPEP would be consistent with the IMPEP reviews of Agreement States with multiple agencies.

During CY 2020, the NRC and its Agreement State partners conducted five IMPEP reviews with the support of seven Agreement State personnel. The Kentucky IMPEP review and associated inspector accompaniments were conducted in person. Due to travel restrictions associated with the Coronavirus Disease 2019 (COVID-19) Public Health Emergency (PHE), the Wyoming, Georgia, Virginia, and Kansas IMPEP reviews were conducted remotely. Inspector accompaniments for all IMPEP reviews were conducted in person. Five Agreement State personnel served as representatives to the five MRB meetings conducted in CY 2020. During CY 2020, the NRC conducted in-person MRB meetings for the California and Arizona IMPEP reviews, while the MRB meetings for the Kentucky, Wyoming, and Georgia IMPEP reviews were conducted remotely. Due to travel restrictions associated with the COVID-19 PHE, six CY 2020 IMPEP reviews were rescheduled to be conducted in CY 2021. As of the date of this report, three of those six IMPEP reviews have been completed. The three remaining IMPEP reviews are scheduled to be completed in CY 2021.

The NRC staff also developed a Temporary Instruction (TI) 003, “Evaluating the Impacts of the COVID-19 Public Health Emergency as Part of the Integrated Materials Performance Evaluation Program (IMPEP)” (ADAMS Accession No. [ML20188A382](#)), in coordination with the Organization of Agreement States, to provide IMPEP teams with guidance on how to review NMP performance in areas that have been adversely affected by the COVID-19 PHE. The purpose of this TI is to identify areas under IMPEP that could be impacted by the COVID-19 PHE and provide guidance on how to consistently assess performance in these areas.

## **AGREEMENT STATE PROGRAM PERFORMANCE**

This section discusses the status of materials programs on heightened oversight or monitoring, and programs that were either adequate, but needs improvement, or not compatible during CY 2020. A brief summary of recent activities related to materials programs on heightened oversight or monitoring is presented in Attachment 1, “Heightened Oversight and Monitoring Status Chart.”

## **Agreement State Programs on Heightened Oversight or Monitoring During CY 2020**

During CY 2020, the Kansas and Rhode Island Agreement State Programs were on monitoring and no programs were on heightened oversight. The Kansas Agreement State Program was subsequently removed from monitoring. Based on the results of the October 2020 IMPEP review, the MRB found Kansas to be adequate to protect public health and safety, and compatible with the NRC's regulatory program.

The Rhode Island Agreement State Program (Rhode Island) was placed on monitoring after the October 2011 IMPEP review, and remained on monitoring after the March 2016 IMPEP review. Based on the results of the 2016 IMPEP review, Rhode Island was found to be adequate to protect public health and safety, but needs improvement, and compatible with the NRC's regulatory program. Following the October 2018 Periodic Meeting, the MRB determined that while Rhode Island continued to make progress in addressing weaknesses, it had not demonstrated a period of sustained performance, and therefore should remain on monitoring. During CY 2020, the NRC continued conducting quarterly calls to monitor Rhode Island's performance. An IMPEP review was scheduled to be conducted in CY 2020, but was postponed due to travel restrictions associated with the COVID-19 PHE. The next IMPEP review is scheduled to be conducted in CY 2021.

## **Agreement State Programs that were Adequate, But Needs Improvement during CY 2020**

As discussed in the section above, during CY 2020, the Kansas Agreement State Program improved from adequate to protect public health and safety, but needs improvement, to adequate to protect public health and safety and compatible with the NRC's regulatory program. Also, Rhode Island remains on monitoring and was found to be adequate to protect public health and safety, but needs improvement, and compatible with the NRC's regulatory program following its March 2016 IMPEP review. During CY 2020, the Florida and Mississippi Agreement State Programs had overall program findings of either adequate to protect public health and safety, but needs improvement, or not compatible with the NRC's regulatory program.

Following its June 2019 IMPEP review, the Florida Agreement State Program (Florida) was found to be adequate to protect public health and safety, but needs improvement, and not compatible with the NRC's regulatory program. The team determined that the declining performance was mainly due to a loss of institutional knowledge and training issues. Although Florida hired staff in a timely manner, the lack of knowledge transfer affected the areas of inspections, reporting of incidents to the Nuclear Material Events Database, and the promulgation of regulations required for compatibility. As a result of the July 2020 Periodic Meeting, NRC staff determined that Florida made progress in addressing corrective actions regarding concerns identified during the 2019 IMPEP review. Staff also determined that Florida is effectively managing its licensing and inspection activities and responding to incidents and allegations, as appropriate. Florida also developed a plan to review regulations on a monthly basis and to prioritize addressing overdue regulations. A second Periodic Meeting is scheduled to be conducted in July 2022, to continue to track the Florida's progress.

While there were no IMPEP activities for the Mississippi Agreement State Program (Mississippi) during CY 2020, the program remained adequate to protect public health and safety, but needs improvement, for reporting purposes. Following its April 2017 IMPEP review, Mississippi was found to be adequate to protect public health and safety, but needs improvement, and

compatible with the NRC's regulatory program, and placed on monitoring. As a result of the April 2018 Periodic Meeting, the period of monitoring was discontinued based on Mississippi's improved performance, including enhancements to staff retention, technical quality of licensing actions, response to incidents and allegations, and the adoption of NRC regulations by reference. The next IMPEP review is scheduled to be conducted in CY 2021.

### **Agreement State Programs that were Not Compatible during CY 2020**

During CY 2020, the Florida and New York Agreement State Programs were not compatible with the NRC regulatory program.

As noted in the section above, Florida was found to be not compatible with the NRC's regulatory program following its June 2019 IMPEP review. Florida was found to be unsatisfactory for the performance indicator Legislation, Regulations, and Other Program Elements. The IMPEP team determined that the declining performance was mainly due to a loss of institutional knowledge and inadequate training of new staff. Although Florida hired staff in a timely manner, the lack of knowledge transfer affected the promulgation to regulations required for compatibility. As a result of the July 2020 Periodic Meeting, NRC staff determined that Florida developed a plan to review regulations on a monthly basis and to prioritize addressing overdue regulations. A second Periodic Meeting is scheduled to be conducted in July 2022 to continue to track Florida's progress.

While there were no IMPEP activities for New York Agreement State Program (New York) during CY 2020, the program remained not compatible for reporting purposes. Based on the results of the March 2018 IMPEP review, the MRB found New York to be adequate to protect public health and safety, but not compatible with the NRC's regulatory program. Based on New York's progress in making performance improvements in the areas of staffing and training and compatibility, the MRB discontinued the period of monitoring. The next IMPEP review is scheduled to be conducted in CY 2022.

### **STATUS OF THE NATIONAL MATERIALS PROGRAM**

The performance of the NMP can be assessed through IMPEP findings, primarily through a review of performance indicator results adequacy and compatibility status.

#### **Performance Indicator Results**

In CY 2020, the NRC and its Agreement State partners conducted 5 IMPEP reviews, evaluating a total of 32 performance indicators. During CY 2020, 31 of the performance indicators reviewed were found to be satisfactory and one performance indicator was found to be satisfactory, but needs improvement. No performance indicators were found to be unsatisfactory.

During the last 5 years, the NRC and its Agreement State partners have conducted 43 IMPEP reviews, evaluating 274 performance indicators. Based on the most recent IMPEP review results for each of the Agreement States and NRC programs that constitute the NMP, 254 performance indicators evaluated were found to be satisfactory, 17 performance indicators were found to be satisfactory, but needs improvement. Only three of the performance indicators were found to be unsatisfactory.



Attachment 2 provides a summary of the most recent IMPEP findings and associated adequacy and compatibility results for the NMP. As shown in this attachment, the most challenged performance indicator is the non-common performance indicator Legislation, Regulations, and Other Program Elements. This performance indicator assesses whether Agreement State programs create conflicts, duplications, gaps, or other conditions that jeopardize an orderly pattern in the regulation of radioactive materials under the AEA. While there were six programs with a rating of satisfactory, but needs improvement, in CY 2019 and CY 2020, the number of unsatisfactory ratings dropped from three programs in CY 2019 to two programs in CY 2020.

### **Adequacy and Compatibility Status in the National Materials Program**

Over the last 5 years, 93 percent of the NMP (36 Agreement State programs and the 4 NRC programs<sup>1</sup>) were adequate to protect public health and safety. Regarding compatibility, 95 percent of Agreement State programs were compatible with the NRC’s regulatory program. Table 1 provides a summary of the adequacy and compatibility results for the Agreement States and NRC programs for the last 5 years. The IMPEP results continue to provide evidence that the NMP provides for reasonable assurance of adequate protection of public health and safety.

<b>Table 1. Adequacy and Compatibility Results CY 2016 – CY 2020</b>					
	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>
<b>National Materials Programs (Number of NRC and Agreement State Programs)</b>	41	41	42	43	43
<b>Agreement State Programs</b>	37	37	38	39	39
<b>Adequate to Protect Public Health and Safety</b>	38	36	38	39	40
<b>Adequate to Protect Public Health and Safety, But Needs Improvement</b>	3	5	4	4	3
<b>Compatible with the NRC’s Regulatory Program</b>	33	34	36	36	37
<b>Not Compatible with the NRC’s Regulatory Program</b>	4	3	2	3	2

### **CONCLUSION**

The NMP continues to provide reasonable assurance of adequate protection of public health and safety. The IMPEP continues to be an effective tool to verify that NRC and Agreement State programs are evaluated in consistent and integrated manner, that public health and safety is being adequately maintained, and that Agreement State programs are compatible with the NRC’s regulatory program. The NRC and its regulatory partners continue to effectively implement the program in a flexible, resilient, and innovative manner to accomplish our mission, despite challenges presented by the ongoing COVID-19 PHE. The Agreement States continue

<sup>1</sup> In January 2020, the NRC made the decision to evaluate the NRC materials programs as a single entity under the IMPEP, beginning in 2021.

to play a valuable role with respect to ensuring consistent implementation of the NMP in protecting the public health and safety with respect to the safe and secure use of radioactive materials.

Attachments:

1. Heightened Oversight and Monitoring Status Chart
2. Summary of National Materials Programs' Performance Indicator Findings and Adequacy and Compatibility

**HEIGHTENED OVERSIGHT AND MONITORING STATUS CHART**

(As of April 13, 2021)

STATE	LAST IMPEP REVIEW	LAST CONTACT	NEXT CONTACT	ACTION(S) DUE
<b>HEIGHTENED OVERSIGHT</b>				
None				
<b>MONITORING</b>				
Rhode Island	Mar. 7-10, 2016	Quarterly Call Feb. 3, 2021	CY 2021 IMPEP May 2021	CY 2021 IMPEP CY 2021

**Summary of National Materials Programs' Performance Indicators  
Findings and Adequacy and Compatibility  
(As of April 13, 2021)**

AGREEMENT STATE/NRC MATERIALS PROGRAM	CALENDAR YEAR OF LAST FULL IMPEP REVIEW CONDUCTED	COMMON PERFORMANCE INDICATORS					NON-COMMON PERFORMANCE INDICATORS				OVERALL PROGRAM RATING		NEXT IMPEP REVIEW
		Technical Staffing and Training	Status of Material Inspection Program	Technical Quality of Inspections	Technical Quality of Licensing Actions	Technical Quality of Incident and Allegation Activities	Legislation, Regulations, and Other Program Elements	Sealed Source and Device Evaluation Program	Uranium Recovery Program	Low-Level Waste Disposal Program	ADEQUACY	COMPATIBILITY	
Alabama	CY 2019	SAT	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate <sup>1</sup>	Compatible <sup>2</sup>	2023
Arizona	CY 2019	SAT	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate	Compatible	2024
Arkansas	CY 2017	SAT	SAT	SAT	SBNI <sup>3,4</sup>	SAT	SAT	-	-	-	Adequate	Compatible	2022
California	CY 2019	SAT	SAT	SAT	SAT	SAT	SAT	SAT	-	-	Adequate	Compatible	2024
Colorado	CY 2018	SAT	SAT	SAT	SAT	SAT	SAT	SAT	SAT	-	Adequate	Compatible	2022
Florida	CY 2019	SAT	SAT	SBNI	SAT	SAT	UNSAT <sup>5</sup>	SAT	-	-	ABNI <sup>6</sup>	Not Compatible <sup>7</sup>	2023
Georgia	CY 2020	SAT	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate	Compatible	2024
Illinois	CY 2018	SAT	SAT	SAT	SAT	SAT	SAT	SAT	SAT	-	Adequate	Compatible	2023
Iowa	CY 2018	SAT	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate	Compatible	2022
Kansas	CY 2021	SAT	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate	Compatible	2025
Kentucky	CY 2020	SAT	SAT	SAT	SAT	SAT	SBNI	SAT	-	SAT	Adequate	Compatible	2024
Louisiana	CY 2016	SAT	SAT	SAT	SAT	SBNI	SAT	SAT	-	-	Adequate	Compatible	2021
Maine	CY 2019	SAT	SAT	SAT	SAT	SAT	SBNI	SAT	-	-	Adequate	Compatible	2023
Maryland	CY 2015	SAT	SAT	SAT	SAT	SAT	SAT	SAT	-	-	Adequate	Compatible	2021
Massachusetts	CY 2018	SAT	SAT	SAT	SAT	SAT	SAT	SAT	-	-	Adequate	Compatible	2022
Minnesota	CY 2016	SAT	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate	Compatible	2022
Mississippi	CY 2017	SAT	SAT	SAT	SBNI	SBNI	SBNI	-	-	-	ABNI	Compatible	2021
Nebraska	CY 2016	SAT	SAT	SAT	SAT	SAT	SBNI	-	-	-	Adequate	Compatible	2021
Nevada	CY 2017	SAT	SAT	SAT	SAT	SAT	SAT	-	-	SAT	Adequate	Compatible	2021
New Hampshire	CY 2016	SAT	SAT	SAT	SAT	SAT	SAT	SAT	-	-	Adequate	Compatible	2021
New Jersey	CY 2019	SAT	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate	Compatible	2024
New Mexico	CY 2017	SAT	SAT	SAT	SAT	SAT	SBNI	-	-	-	Adequate	Compatible	2021
New York	CY 2018	SBNI	SAT	SAT	SAT	SAT	UNSAT	SAT	-	SAT	Adequate	Not Compatible	2022
North Carolina	CY 2018	SAT	SAT	SAT	SAT	SAT	SAT	SBNI	-	-	Adequate	Compatible	2022

<sup>1</sup> Adequate to protect public health and safety (Adequate).  
<sup>2</sup> Compatible with NRC's regulatory program (Compatible).  
<sup>3</sup> Satisfactory, but needs improvement (SBNI).  
<sup>4</sup> Indicator changed as a result of the CY 2019 Follow-Up IMPEP review.  
<sup>5</sup> Unsatisfactory (UNSAT).  
<sup>6</sup> Adequate to protect public health and safety, but needs improvement (ABNI).  
<sup>7</sup> Not compatible with NRC's regulatory program (Not Compatible).

**NRC and Agreement State Radioactive Materials Programs' Findings for  
Performance Indicators and Adequacy and Compatibility  
(As of April 13, 2021)**

Agreement State/NRC Materials Program	Calendar Year of Last Full IMPEP Review Conducted	COMMON PERFORMANCE INDICATORS					NON-COMMON PERFORMANCE INDICATORS				OVERALL PROGRAM RATING		NEXT IMPEP REVIEW
		Technical Staffing and Training	Status of Material Inspection Program	Technical Quality of Inspections	Technical Quality of Licensing Actions	Technical Quality of Incident and Allegation Activities	Legislation, Regulations, and Other Program Elements	Sealed Source and Device Evaluation Program	Uranium Recovery Program	Low-Level Waste Disposal Program	ADEQUACY	COMPATIBILITY	
North Dakota	CY 2019	SAT	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate	Compatible	2024
Ohio	CY 2019	SAT	SAT	SAT	SAT	SAT	SAT	SAT	-	-	Adequate	Compatible	2024
Oklahoma	CY 2018	SAT	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate	Compatible	2023
Oregon	CY 2017	SAT	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate	Compatible	2021
Pennsylvania	CY 2019	SAT	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate	Compatible	2024
Rhode Island	CY 2016	SBNI	UNSAT	SAT	SAT	SAT	SAT	-	-	-	ABNI	Compatible	2021
South Carolina	CY 2017	SAT	SAT	SAT	SAT	SAT	SAT	SAT	-	SAT	Adequate	Compatible	2022
Tennessee	CY 2016	SAT	SAT	SAT	SAT	SAT	SAT	SAT	-	-	Adequate	Compatible	2021
Texas	CY 2018	SAT	SAT	SAT	SBNI	SAT	SAT	SAT	SBNI	SAT	Adequate	Compatible	2022
Utah	CY 2019	SAT	SAT	SAT	SAT	SAT	SAT	-	SAT	SAT	Adequate	Compatible	2023
Vermont <sup>9</sup>		-	-	-	-	-	-	-	-	-	Adequate	Compatible	2021
Virginia	CY 2020	SBNI	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate	Compatible	2024
Washington	CY 2018	SAT	SAT	SAT	SBNI	SAT	SBNI	SAT	SAT	SAT	Adequate	Compatible	2022
Wisconsin	CY 2019	SAT	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate	Compatible	2024
Wyoming	CY 2020	SAT	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate	Compatible	2024
NRC HQ-SSD	CY 2014	-	-	-	-	-	-	SAT	-	-	Adequate	NA	2021 <sup>10</sup>
NRC Region I	CY 2015	SAT	SAT	SAT	SAT	SAT	-	-	-	-	Adequate	NA	2021
NRC Region III	CY 2017	SAT	SAT	SAT	SAT	SAT	-	-	-	-	Adequate	NA	2021
NRC Region IV	CY 2019	SAT	SAT	SAT	SAT	SAT	-	-	SAT	-	Adequate	NA	2021

<sup>9</sup> Vermont Agreement signed September 30, 2019, with the first IMPEP review scheduled in 2021.

<sup>10</sup> NRC's next IMPEP review will consolidate all headquarters and regional materials programs into a single integrated review scheduled in CY 2021.