



The IMPEP Basics

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Manager

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Section 274 of the Atomic Energy Act of 1954, as amended

- provides the statutory basis by which the NRC may discontinue portions of its regulatory authority to license and regulate byproduct materials, source materials, and certain quantities of special nuclear material.
- requires that the NRC, in its oversight role, to periodically review Agreement States to ensure the radiation control programs are adequate to protect public health and safety and compatible with the NRC's regulatory program





Periodic Review

To ensure public health and safety are adequately maintained and Agreement State programs are compatible with NRC's regulatory program.

Direction and Guidance

<https://scp.nrc.gov/>

[MD 5.6](#), “IMPEP”

[SA-100](#), “Implementation of IMPEP”

[TI-003](#), “Evaluating the Impacts of the PHE”



Performance Indicators

COMMON

- 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

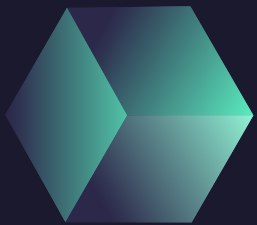
NON-COMMON

- Legislation, Regulations, and other Program Elements (LROPE) [formerly known as “Compatibility”],
- Sealed Source and Device Evaluation Program
- Low-Level Radioactive Waste Disposal Program
- Uranium Recovery Program



Performance Indicator Ratings

- Satisfactory
- Satisfactory but Needs Improvement
- Unsatisfactory



Recommendations

Constructive feedback to promote improvement

This can serve as the basis for developing recommendations for corrective actions.

The team should seek to identify and understand the root cause(s) of the programmatic performance issues.

Criteria and Examples of Recommendations can be found in the IMPEP Toolbox on the state communications portal Web site.

Overall IMPEP Review Findings

ADEQUACY

- Adequate to Protect Public Health and Safety
- Adequate, but Needs Improvement
- Not Adequate to Protect Public Health and Safety

COMPATIBILITY

- Compatible
- Not Compatible



Elements of an IMPEP Review



BEFORE THE ON-SITE REVIEW

- Questionnaire
- Inspector accompaniments

ON-SITE REVIEW WEEK

- Entrance meeting on Monday
- Review casework
- Interviews
- Documentation
- Staff briefing on Thursday
- Senior management exit on Friday

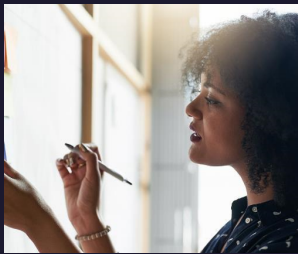
AFTER THE ON-SITE REVIEW

- Results documented in a publicly-available report
- Management Review Board (MRB) Meeting

IMPEP Mantra

NO Surprises

Preparation



1-2 weeks prior to review

Read and know your Indicator and the Program you will be reviewing



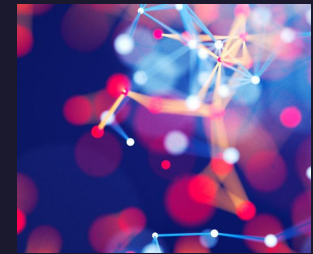
1-2 days prior to review

Bring documents with you and be ready to start on Monday



On-site review

Be prepared for long days
Daily team debriefs



Week After

Document your findings following the IMPEP report template

On-Site Member Conduct

- Be courteous, professional, honest, and prepared
- Minimize impact on the Program
- Use time wisely - time is very precious
- Be ready to assist other team members, if necessary
- Focus on health and safety and performance
- Avoid the appearance of conflicts of interest, personal agendas and/or opinions

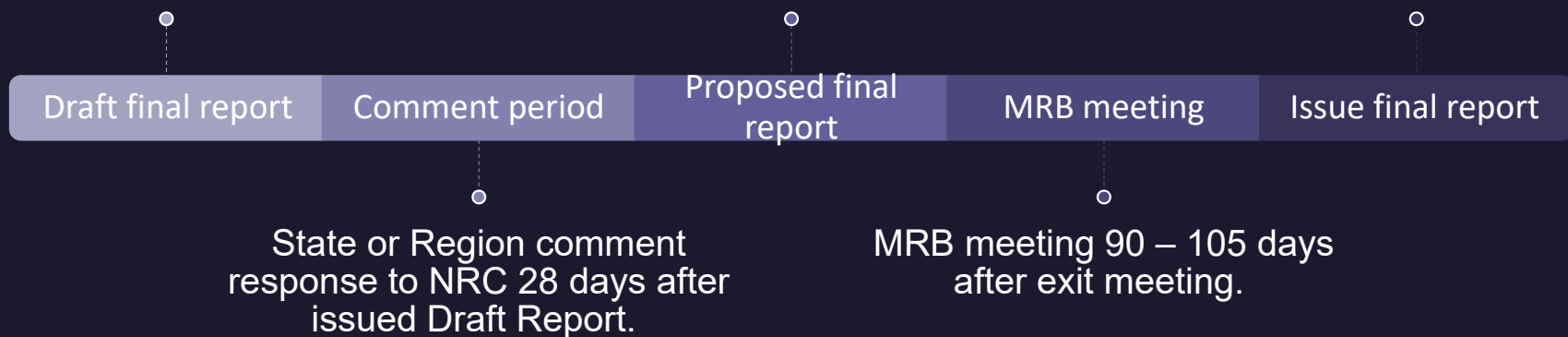


Timeline

Draft IMPEP Report issued for factual comment 45 days after exit meeting.

Proposed final report to MRB at least 7 days prior to the MRB Meeting.

Final IMPEP report issued 30 days after the MRB Meeting (CBJ metric).





Summary

- Always keep your team leader informed.
- No Surprises
- Follow the process

Thank You

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