

INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM – OVERVIEW

The Integrated Materials Performance Evaluation Program (or IMPEP) is used to periodically review radiation control programs to ensure that public health and safety are adequately maintained.

- **IMPEP – Direction and Guidance (<https://scp.nrc.gov/>):**
 - [MD 5.6](#), "*Integrated Materials Performance Evaluation Program (IMPEP)*" [July 24, 2019], and the interim State Agreement (SA) procedures define the IMPEP process and criteria used to assess radiation control program adequacy and compatibility.
 - [SA-100](#), "*Implementation of the Integrated Materials Performance Evaluation Program (IMPEP)*" [September 30, 2020] provides guidance for conducting the IMPEP reviews including scheduling, staffing, and reporting the results of IMPEP reviews.

- **IMPEP – Purpose**
 - IMPEP reviews provide a mechanism to conduct independent assessments of Agreement State and NRC radiation control programs to ensure that public health and safety are adequately maintained and that Agreement State programs are compatible with NRC's regulatory program.

- **IMPEP – Process**
 - IMPEP reviews are conducted by teams of NRC and Agreement State (AS) staff members in accordance with MD 5.6 and SA procedures.

 - Program performance is based on the review of the following common and non-common performance indicators:
 - **Common Performance Indicators:**
 - Technical Staffing and Training, [SA-103](#)
 - Status of Materials Inspection Program, [SA-101](#)
 - Technical Quality of Inspections, [SA-102](#)
 - Technical Quality of Licensing Actions, [SA-104](#)
 - Technical Quality of Incidents and Allegations Activities, [SA-105](#)

 - **Non-Common Performance Indicators:**
 - Legislation, Regulations, and other Program Elements (LROPE) [formerly known as "Compatibility"], [SA-107](#)
 - Sealed Source and Device Evaluation Program, [SA-108](#)
 - Uranium Recovery Evaluation Program, [SA-110](#)
 - Low Level Radioactive Waste Disposal Program, [SA-109](#)

 - Overall adequacy findings for NRC and Agreement State programs are:
 - [Adequate](#) to Protect Public Health and Safety;
 - [Adequate](#) to Protect Public Health and Safety, [But Needs Improvement](#); or
 - [Not adequate](#) to Protect Public Health and Safety.

- Agreement State programs are found to be compatible with the NRC's regulatory program when AS programs do not create conflicts, duplications, gaps, or other conditions that jeopardize an orderly pattern in the regulation of agreement material.
- Compatibility findings for AS programs are either:
 - Compatible, or
 - Not Compatible.
- IMPEP review frequency ranges from 1–5 years, based on the program's performance.
- **Follow-Up IMPEP reviews:**
 - A follow-up IMPEP review is a limited evaluation of one or more of the common and/or non-common indicators that were found less than satisfactory in a previous IMPEP review and is conducted before the next routine IMPEP review.
 - A periodic meeting is conducted in conjunction with the follow-up IMPEP to discuss the indicators that were found satisfactory during the previous IMPEP review.
- **Periodic Meetings:**
 - The purpose of the periodic meetings is to provide the NRC with a mid-cycle opportunity to engage and exchange information about program status and performance and plan for future IMPEP reviews. Guidance for the conduct of Periodic Meetings is provided in SA-116, Periodic Meetings Between IMPEP Reviews." [SA-116](#) was recently revised.
- **IMPEP Timeliness Metrics:**
 - Draft IMPEP Report issued for factual comment 45 days after exit meeting.
 - State or Region comment response to NRC 28 days after issued Draft Report.
 - Proposed final report to MRB at least 7 days prior to the MRB Meeting.
 - MRB meeting 90 – 105 days after exit meeting.
 - Final IMPEP report issued 30 days after the MRB Meeting.

MANAGEMENT REVIEW BOARD OVERVIEW

The Management Review Board (MRB) makes independent findings of radiation control Program adequacy and compatibility, based on the results of an Integrated Materials Performance Evaluation Program (IMPEP) review, and input from IMPEP team, MRB members, and the Agreement State Program under review.

- **Management Review Board – Guidance (<https://scp.nrc.gov/>)**
 - [SA-106](#), "The Management Review Board" [September 16, 2020] provides guidance on the structure, composition, and decision-making authority of the MRB.

- **MRB Roles:**
 - Provides an independent senior-level management assessment of the IMPEP review findings and recommendations.
 - Makes independent findings of program adequacy and compatibility, based on the results of the IMPEP review.
 - Evaluates the results of follow-up IMPEP reviews conducted to evaluate performance weakness(es).
 - Directs issuance of letters of support to ASs, as appropriate.
 - Places programs on enhanced oversight (e.g., Monitoring, Heightened Oversight).
 - Recommends program Probation, Suspension, or Termination to the Commission.
 - Establishes precedents and changes to IMPEP, as appropriate.
 - The MRB chair has the final decision-making authority and issues the final NRC findings to the radiation control program.
 - MRB decision about placing programs on enhanced oversight may be appealed to the EDO for certain limited circumstances (only for MRB decisions directing that a program continue or enter a period of Monitoring or Heightened Oversight).

- **MRB Membership:**
 - Deputy Executive Director for Materials, Waste, Research, State, Tribal, Compliance, Administration and Human Capital Programs (DEDM) – Chair.
 - NRC General Counsel, or designee – MRB Member.
 - Director, Office of Nuclear Material Safety and Safeguards – MRB Member.
 - Regional Administrator or Deputy Regional Administrator – MRB Member.
 - Agreement State Representative – MRB Member.

- **MRB Meeting Attendance:**
 - MRB members, IMPEP Review Team, IMPEP Project Management.
 - NRC or State/Regional program representative(s).
 - Interested NRC staff and members of the general public.

- **Typical MRB Meeting Preparation:**
 - Documents are provided to MRB members at least 1 week prior to MRB meeting.
 - MRB members review the proposed final IMPEP report, and any comment resolution
 - MRB members review briefing bullets and script.
 - MRB chair will solicit questions from MRB members for the proposed final IMPEP report.
 - Staff will ensure distribution of any preliminary questions from the MRB members to the IMPEP review team.

- **Typical MRB Meeting Structure/Format:**
 - Opening, introductions, and purpose statement.
 - Indicator-by-indicator IMPEP Team presentations.
 - MRB discussion and findings on each of the individual indicators.
 - MRB discussion and findings on the overall program adequacy and compatibility including any MRB directed changes to report language, recommendations, ratings, and/or findings.
 - Determination of the timing of next IMPEP review and periodic meeting.
 - Final decision on any enhanced oversight team recommendation, if applicable.
 - Engage members of the public for comment after business portion of meeting.

- **Special MRB Meetings:**
 - Special MRB meetings are convened to discuss outcomes of select periodic meetings, and deliberate next actions when a program meets any of the following conditions:
 - The program is on monitoring, heightened oversight, or probation;
 - The program was found Adequate, But Needs Improvement or Not Compatible during the last IMPEP review;
 - A program performance degradation that could result in a less than satisfactory finding for one or more indicators is identified during the periodic meeting;
 - The program specifically requests a special MRB to discuss the periodic meeting; or
 - The MRB Chair requests a special MRB.