FSME Procedure Approval

Implementation of Management Directive 5.10, “Formal Qualifications for IMPEP Team Members”

SA-111

Issue Date:

Review Date:

Janet R. Schlueter
Director, MSSA  
Date:

Scott W. Moore  
Deputy Director, MSSA  
Date:

Aaron T. McCraw
Procedure Contact, MSSA  
Date:

NOTE

These procedures were formerly issued by the Office of State and Tribal Programs (STP). Any changes to the procedure will be the responsibility of the FSME Procedure Contact as of October 1, 2006. Copies of FSME procedures will be available through the NRC website.
I. INTRODUCTION

This document describes the procedure for implementing NRC Management Directive (MD) 5.10, “Formal Qualifications for Integrated Materials Performance Evaluation Program (IMPEP) Team Members.”

II. OBJECTIVE

To implement the qualifications and training established in MD 5.10 within the Office of Federal and State and Tribal Materials and Environmental Management Programs (STP-FSME) through the use of a written qualification guide for STP-FSME IMPEP team members and team leaders.

III. BACKGROUND

NRC conducts periodic assessments of NRC Regional and Agreement State radiation control and radioactive materials programs and NRC Regional offices pursuant to Management Directive (MD) 5.6, “Integrated Materials Performance Evaluation Program.” IMPEP teams are comprised of staff from STP-FSME, Office of Nuclear Material Safety and Safeguards (NMSS), NRC Regional offices, and Agreement States.

The training and qualification process detailed in MD 5.10 is intended to provide IMPEP team members and team leaders with sufficient knowledge to conduct NRC Regional and State radioactive materials program reviews that are technically correct and in accordance with NRC policies and procedures. To facilitate implementation of this directive within FSME, an IMPEP Qualification Form and an IMPEP Qualification Guides have been prepared (see Appendix A and Appendix B, respectively).

IV. ROLES AND RESPONSIBILITIES

A. Director, STP-FSME:

1. Ensure that personnel acting as IMPEP team members or team leaders meet the formal qualifications or alternate criteria as described in MD 5.10.

2. Signs, or designates responsibility for signing, the IMPEP Qualification Form for each FSME IMPEP participant.
B. Senior IMPEP Project Manager: for IMPEP Coordination:

1. Maintains current copies of the IMPEP Qualification Form for all IMPEP team members and supporting IMPEP Qualification Guides for all IMPEP team members in STP;

2. Ensures that individuals assigned as IMPEP team members, including team leaders, meet the formal qualifications or alternate criteria, as described in MD 5.10; and,

3. Tracks each IMPEP-qualified individual’s status and need for refresher training, per the policy for refresher training.

C. IMPEP Team Member:

1. Using the IMPEP Qualification Guides, documents relevant course work and experience, as well as alternative criteria, such as equivalency examinations, waivers, grandfathering, or interim qualification described in MD 5.10, as appropriate, for the team member’s specific IMPEP responsibilities;

2. Prepares and signs the IMPEP Qualification Form;

3. Reviews and updates the IMPEP Qualification Form and supporting IMPEP Qualification Guide to reflect all changes in qualification; and,

4. Submits a current copy of the IMPEP Qualification Form to the IMPEP Project Manager prior to participating in any assigned reviews.

V. GUIDANCE

A. Documenting Qualifications:

1. Each IMPEP team member should complete an IMPEP Qualification Guide for each indicator that the team member is qualified to act as principal reviewer for or team leader, as appropriate.

2. Each IMPEP team member should complete the “General IMPEP Qualifications” guide in the IMPEP Qualification Guide.

3. The Each IMPEP team member should fully document any grandfathering, interim qualification, or other alternative means of qualification used
(including journal qualification under NRC Inspection Manual Chapter 1246, Formal Qualification Programs in the Nuclear Material Safety and Safeguards Program Area, etc.) in the “Alternative Criteria/Comments” sections provided in the IMPEP Qualification Guide. Attach additional sheets, if necessary.

4. The IMPEP Qualification Form should be signed by the IMPEP team member and the Director, STPFSME, or designee. All principal reviewer and team leader qualifications should be documented by the Director, STP.

5. A copy of each completed IMPEP Qualification Form and guide should be given to the Senior IMPEP Project Manager for IMPEP coordination to keep on file.

B. Updating Qualifications:

1. Each time a new course is completed or new qualification is achieved, the team member’s personal IMPEP Qualification Guide should be updated, as appropriate.

2. A new IMPEP Qualification Form should be completed each time an IMPEP participant becomes qualified to act as principal reviewer for an additional indicator; or as team leader.

3. Refresher training should be documented as a line item on the appropriate indicator forms as necessary. on a refresher training page and attached to the team member’s appropriate qualification guide.

C. Refresher Training

IMPEP team members are only required to attend refresher training if: 1) they did not participate in an IMPEP review the previous fiscal year; 2) they did not receive new member training in the previous fiscal year; and 3) they are scheduled for a review in the upcoming fiscal year.

VI. APPENDICES

Appendix A - IMPEP Qualification Form
Appendix B - Office of State and Tribal Programs IMPEP Qualification Guide

VII. REFERENCES
1. Inspection Manual Chapter 1246, “Formal Qualification Programs in the Nuclear Material Safety & Safeguards Program Area.”
2. NRC Management Directive 5.6, “Integrated Materials Performance Evaluation Program (IMPEP).”

VIII. ADAMS REFERENCE DOCUMENTS

For knowledge management purposes, all previous revisions of this procedure, as well as associated correspondence with stakeholders, that have been entered into the NRC’s Agencywide Document Access Management System (ADAMS) are listed below.

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Appendix A

IMPEP QUALIFICATION FORM

************************************************************************************
IMPEP Team Member:

Signature                       Date

Printed Name                   Title

************************************************************************************
Office Director, Regional Administrator, or Agreement State Program Director (or Designee):

Signature                       Date

Printed Name                   Title

QUALIFICATION AUTHORIZATION
(Please check all applicable boxes)

COMMON PERFORMANCE INDICATORS         NON-COMMON PERFORMANCE INDICATORS

☐ Technical Staffing and Training  ☐ Legislation and Program Elements Required for
☐ Status of Materials Inspection Program  Compatibility
☐ Technical Quality of Inspections  ☐ Sealed Source and Device Evaluation Program:
☐ Technical Quality of Licensing Actions  Full Technical Review
☐ Technical Quality of Incident and  ☐ Sealed Source and Device Evaluation Program:
☐ Allegation Activities: Incident Review  Limited Scope Review
☐ Technical Quality of Incident and  ☐ Low-Level Radioactive Waste Disposal Program
☐ Allegation Activities: Allegation Review  ☐ Uranium Recovery Program
☐ TEAM LEADER                     ☐ Fuel Cycle Inspection Program
☐                               ☐ Site Decommissioning Management Plan

NOTE
Based on the guidelines established in Management Directive 5.10, Formal Qualifications for IMPEP Team Members, the manager/supervisor above verifies that this IMPEP team member is fully qualified to act as principal reviewer and/or team leader, as noted.
## Appendix B

### GENERAL IMPEP QUALIFICATIONS

**STAFF NAME:**

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Alternative Qualifications/Comments:

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**OFFICE OF STATE AND TRIBAL PROGRAMS - IMPEP QUALIFICATION GUIDE**

Page 1

**December 1, 2000**
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**E. PROFESSIONAL EXPERIENCE – 2 years experience with a radioactive materials program before and within 5 years of participating in IMPEP.**

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Alternative Qualifications/Comments:

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Alternative Qualifications/Comments:

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*Note: The asterisks indicate courses or topics that are optional or additional to the core requirements.*
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<td>NRC NUREG-1556 Series, “Consolidated Guidance About Materials Licenses”</td>
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**E. PROFESSIONAL EXPERIENCE - 2 years as an independent license reviewer before and within 5 years of participating in IMPEP**

Alternative Qualifications/Comments:

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<td>NRC MD 8.3, “NRC Incident Investigation Program”</td>
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<td>NUREG-1303, “Incident Investigation Manual”</td>
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<td>Handbook on Nuclear Materials Event Reporting in the Agreement States</td>
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<td>Nuclear Materials Event Database (NMED)</td>
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Alternative Qualifications/Comments:

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RESPONSE TO INCIDENTS AND ALLEGATIONS:
ALLEGATION RESPONSE LIMITED REVIEW
PRINCIPAL REVIEWER

TECHNICAL QUALITY OF INCIDENT AND ALLEGATION ACTIVITIES:
ALLEGATION REVIEW

STAFF NAME:

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<td>NRC MD 8.8, “Management of Allegations”</td>
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<td>NRC Allegation Memoranda, 96-01, 96-02, 98-01, 00-001, 03-001, 04-002 and 04-003</td>
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<td>SECY-98-192, “Resolution of Allegations Concerning the Performance of Agreement State Programs”</td>
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<td>SA-400, “Management of Allegations”</td>
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<td>E. <strong>PROFESSIONAL EXPERIENCE</strong> - some involvement with the resolution or management of allegations before and within 5 years of participating in IMPEP</td>
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Alternative Qualifications/Comments:

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OFFICE OF STATE AND TRIBAL PROGRAMS-IMPEP QUALIFICATION GUIDE
Page 10
### Form Completion:

**Staff Name:**

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<td>SA-200, “Compatibility Categories and Health &amp; Safety Identification for NRC Regulations and Other Program Elements”</td>
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<td>SA-201, “Review of State Regulatory Requirements”</td>
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<td>E. <strong>Professional Experience</strong></td>
<td>Direct involvement in some aspect of the promulgation of NRC or Agreement State regulations before and within 3 years of participating in IMPEP or the review of two Agreement State regulations for compatibility before and within 2 years of participating in IMPEP</td>
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### SEALED SOURCE AND DEVICE EVALUATION PROGRAM:
#### FULL TECHNICAL REVIEW

**STAFF NAME:**

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<td><strong>E. PROFESSIONAL EXPERIENCE</strong> - 2 years experience as an independent SS&amp;D reviewer before and within 5 years of participating in IMPEP</td>
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**E. PROFESSIONAL EXPERIENCE -** 5 years experience with a radioactive materials program before and within 10 years of participating in IMPEP

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**E. PROFESSIONAL EXPERIENCE** - 2 years working as an inspector, license reviewer, or as a developer of regulatory programs for ensuring safety of LLRW disposal before and within 5 years of participating in IMPEP

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<td><strong>B. SUPPLEMENTAL TRAINING</strong></td>
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<tr>
<td>Root Cause/Incident Investigation Workshop (G-205)</td>
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<td><strong>C. REFRESHER TRAINING</strong></td>
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### Formal Experience as Described in MD 5.10

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<td><strong>D. SELF-STUDY</strong></td>
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<tr>
<td>10 CFR Part 40, Appendix A</td>
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<tr>
<td>NUREG-1569, “Standard Review Plan for In Situ Leach Uranium Extraction License Applications”</td>
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<tr>
<td>NRC IMC 2801, “Uranium Mill and 11e.(2) Byproduct Material Disposal Site and Facility Inspection Program”</td>
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<td>NRC IMC 2641, “In Situ Leach Facility Inspection Program”</td>
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### Alternative Qualifications/Comments:

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<tr>
<th>Formal Courses as Described in MD 5.10</th>
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<tr>
<td><strong>A. CORE TRAINING</strong></td>
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<tr>
<td>Fundamentals of Inspection (G-101) or Inspection Procedures (G-108)</td>
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<td>Licensing Practices and Procedures (G-109)</td>
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<td>Inspection for Performance - Materials Version (G-304)</td>
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<tr>
<td>Applied Health Physics (H-109), Introductory Health Physics (H-117), or Health Physics Technology (H-201)</td>
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<td>Leading NRC Work Teams (PDC)</td>
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<td>Diagnostic and Therapeutic Nuclear Medicine (H-304)</td>
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<td>Safety Aspects of Industrial Radiography (H-305)</td>
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<td>Transportation of Radioactive Materials (H-308)</td>
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<td>Teletherapy and Brachytherapy, Gamma Knife and Emerging Technologies (H-313)</td>
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<td>Safety Aspects of Well Logging (H-314)</td>
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<td>Irradiator Technology (H-315)</td>
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<tr>
<td>Managing Other People’s Writing (PDC) Leading NRC Work Teams</td>
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<td>Situational Leadership (PDC)</td>
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<td>Effective Communications for NRC Inspectors (OP)</td>
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<td>IMPEP Leader Course</td>
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TEAM LEADER QUALIFICATIONS (cont.)

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<tr>
<td>NRC IMC 1220, “Processing of NRC Form 241,” Report of Proposed Activities in Non-Agreement States, and Inspection of Agreement States licensees operating under 10 CFR 150.20”</td>
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<td>NRC IMC 1246, “Formal Qualification Programs in the Nuclear Materials Safety and Safeguards Program”</td>
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<td>NRC IMC 2800, “Materials Inspection Program”</td>
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<td>NRC Management Directive 8.8, “Management of Allegations”</td>
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<tr>
<td><strong>E. PROFESSIONAL EXPERIENCE</strong></td>
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<tr>
<td>5 years experience with a radiation-radioactive materials program before and within 10 years of participating in IMPEP</td>
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<tr>
<td>Qualified to act as principal reviewer for at least one performance indicator</td>
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<tr>
<td>Participation in at least one IMPEP review as a principal reviewer for any indicator</td>
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<tr>
<td>Participation as Team Leader In Training for at least one IMPEP Review</td>
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Alternative Qualifications/Comments:

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