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FSME Procedure Approval

Followup Integrated Materials Performance Evaluation Program (IMPEP) Reviews

SA-119

Issue Date:
Report Date:

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NOTE

***Any changes to the procedure will be the responsibility of the FSME Procedure Contact.
Copies of the FSME procedures are available through the NRC website.***



Procedure Title:
Followup IMPEP Reviews
Procedure Number: SA-119

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I. INTRODUCTION

~~A. Depending on the findings of an Integrated Materials Performance Evaluation Program (IMPEP) review, the Management Review Board (MRB) may direct that a followup IMPEP review take place. This document describes the procedures describes the general objectives and process to be followed whenfor conducting followup reviews of the U.S. Nuclear Regulatory Commission (NRC) Regional and Agreement State materials programs under the Integrated Materials Performance Evaluation Program (IMPEP), including scheduling, conducting, assigning personnel for, and reporting the results of the reviews. The scope of the followup review will be dependantdependent on the areas of the program identified as in needingof improvement.~~

~~B. Depending on the findings of an IMPEP review, the Management Review Board (MRB) may direct that a followup IMPEP review take place. The scope of the followup review will be dependant on the areas of the program identified as in need of improvement.~~

II. OBJECTIVES

~~To provide the guidelines that will be followed by IMPEP teams when preparing, conducting, and reporting results of followup IMPEP reviews of NRC Regional and Agreement State materials programs.~~

- ~~A. To identify the appropriate individuals responsible for scheduling, conducting, participating in, and reporting the results of a followup review.~~
- ~~B. To define the scope of activities and areas to be examined during a followup review.~~
- ~~C. To define the methods and the timing for documenting and communicating the results of a followup review.~~

III. BACKGROUND

~~As of October 1, 2006, NRC reorganized its nuclear materials and Agreement State programs into two new program offices. The newly created Office of Federal and State Materials and Environmental Management Programs (FSME) is comprised of the former Office of State and Tribal Programs and two technical divisions from the Office of Nuclear Material Safety and Safeguards. NRC Regional and Agreement State materials~~

programs are reviewed at least every four years under IMPEP. The MRB may direct that a followup review be conducted prior to the standard four-year interval. A followup review will normally occur during or after a period of heightened oversight and will be conducted to evaluate the program's response to previous IMPEP recommendations and to evaluate the status of any indicator found satisfactory, **but needs improvement with recommendations for improvement** or unsatisfactory during the last IMPEP review. The followup review can also be used to evaluate all of the common and applicable non-common performance indicators as in a full IMPEP review, or focus on one or more specific indicators. A followup review can be used to track the progress of a program, and thus help determine the timing of the next IMPEP review, whether previous indicator findings should be changed or whether additional oversight may be needed. During each followup review, the team is also responsible for completing all elements of a periodic meeting as described in **the Office of Federal and State Materials and Environmental Management Programs (FSME) Procedure SA-116**.

IV. ROLES AND RESPONSIBILITIES

FSME is the lead office responsible for coordination of Agreement State and NRC Regional followup IMPEP reviews. Additional information on roles and responsibilities can be found in FSME Procedure SA-100, *Implementation of the Integrated Materials Performance Evaluation Program (IMPEP)*.

A. MRB:

1. Provides direction ~~usually through prior IMPEP review findings, or review of the results of a periodic meeting,~~ on the need for a followup review. This is usually determined from the results of a prior IMPEP review or Periodic Meeting.
2. For followup reviews, the roles and responsibilities of the MRB and the guidelines to be followed by the MRB are the same as those detailed in FSME Procedure SA-106, *The Management Review Board*.

B. Director, FSME:

1. Designates the appropriate division director(s) to attend followup IMPEP review exit meetings.
2. Acts as, or designates a FSME representative, as a MRB member per FSME Procedure SA-106 and concurs on final followup IMPEP reports.

C. Director, Division of Materials Safety and State Agreements (DMSSA):

1. Attends Agreement State and Regional IMPEP review exit meetings.
2. Can designate the Deputy Division Director, DMSSA, to attend IMPEP review exit meetings.

~~D.~~ Chief, Agreement State Program Branch (ASPB), FSME:

1. ~~Forwards the proposed final report of followup reviews to the MRB.~~
2. ~~Attends the MRB meeting.~~

~~E.~~ IMPEP Project Manager, DMSSA:

1. Reviews and provides feedback on all followup IMPEP reports to both the IMPEP team leader and FSME management.
2. Coordinates MRB meetings per FSME Procedure SA-106, as necessary.
3. ~~Forwards Agreement State followup review proposed final reports to the MRB.~~ Concurs on draft IMPEP report.

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EF. IMPEP Team Leader:

1. **Schedules,** ~~C~~oordinates and conducts assigned followup IMPEP reviews~~;~~.
2. Completes the IMPEP report in accordance with Management Directive (MD) 5.6, *Integrated Materials Performance Evaluation Program (IMPEP)*, FSME Procedure SA-106, and this procedure~~;~~.
3. Designates an IMPEP team member to act as principal reviewer for each applicable performance indicator~~;~~.
4. Signs draft followup IMPEP reports **issued** to the Agreement State or Region~~;~~.
5. Presents review findings at MRB meetings.

FG. Regional State Agreements Officer (RSAO):

1. Participates in all IMPEP followup reviews for Agreement States in their assigned Region when such a review is directed by the MRB~~;~~.
2. Completes the review of their assigned indicator(s) in accordance with the applicable FSME procedures and writes their assigned section(s) of the followup IMPEP report~~;~~.
3. Ensures the periodic meeting portion of the followup IMPEP review is completed and prepares the meeting summary, as necessary~~;~~.
4. Presents review findings at an MRB meeting.

GH. IMPEP Team Member:

1. Completes the review of their assigned indicator(s) in accordance with the applicable FSME procedure(s)~~s~~ and writes their assigned section(s) of the followup IMPEP report.
2. Presents review findings at MRB meetings.

V. GUIDANCE

A. Scope of Followup IMPEP Reviews:

1. The followup review will include a complete review of one or more of the common and/or non-common performance indicators since the previous IMPEP review. Normally, these are indicators that resulted in findings of “satisfactory~~with recommendations for,~~ **but needs** improvement” or “unsatisfactory” during the previous IMPEP review. The review team will

conduct an evaluation of the program's response to previous IMPEP review recommendations dealing with these indicators. The team will recommend to the MRB whether these recommendations may be closed out or remain open. Additional recommendations for these indicators may also be developed during the followup review. The team may also make recommendations for changes to the previous IMPEP review findings for these indicators.

2. For Agreement State followup reviews, the radiation control program must also be considered as a whole, even during a limited scope followup review. To accomplish this goal, the meeting agenda in FSME Procedure SA-116, *Periodic Meetings with Agreement States*, will be followed (the normal schedule for periodic meetings outlined in SA-116 should not be followed, if a followup review is conducted). Any recommendations from previous IMPEP reviews could be closed during followup IMPEP reviews.
3. A radiation control program experiencing serious weaknesses because of the loss of key staff, loss of operating funds, or other acute problems may receive a followup IMPEP review that focuses on all aspects of the program. All common and applicable non-common performance indicators will be reviewed during a full followup IMPEP review. A followup IMPEP review of this type should be conducted for a program that does not receive satisfactory findings for the majority of the performance indicators.

B. Assignment of Personnel for Followup IMPEP Reviews

1. With the exception of the RSAO, team members should be different from those who conducted the previous IMPEP review.

2. Assignment of staff to specific performance indicators will be in accordance with the qualifications established in MD 5.10, *Formal Qualifications for Integrated Materials Performance Evaluation Program (IMPEP) Team Members*.
3. Team members should be chosen to evaluate the indicator(s) based on the scope of the review. Team size should be appropriate to cover all designated indicators, as well as to discuss remaining program areas. If a team consists of three team members or more, at least one member should be an Agreement State representative.
4. The criteria for selecting team members established in FSME Procedure SA-100 should be followed in choosing team members for a followup review.

C. Scheduling Followup IMPEP Reviews

Followup review scheduling should be completed along with routine scheduling as detailed in FSME Procedure SA-100 and should follow the time frame reflected in the previous final IMPEP report or as directed by the MRB. Followup reviews are normally performed approximately one year following ~~either~~ the previous IMPEP review, periodic meeting or MRB meeting.

D. Scheduling Letter and Review Questionnaire

1. The team leader should send a letter to the Radiation Control Program Director or the NRC Regional Director, Division of Nuclear Materials Safety (DNMS) at least 60 days prior to the followup review. The letter should reference the discussion which established the review date, detail the dates of the program review, and request the Radiation Control Program Director or Regional DNMS Director to schedule a closeout meeting of appropriate senior State managers or NRC Regional Administrator for the purpose of discussing the results of the review.

- a. The exit meeting should take place on the final day of the review.
 - b. Copies of the letter should be sent to the team members, the IMPEP Project Manager, the NRC Regional State Liaison Officer, the RSAO, and the Division Director, DMSSA.
2. The team leader and the Radiation Control Program Director or Regional Director, DNMS should agree if a questionnaire is necessary. If appropriate, the letter should include a current IMPEP questionnaire. The questionnaire may be modified to include only those questions dealing with the indicator(s) applicable to the review. In addition to the printed version of the questionnaire, an electronic copy should also be provided. (See [Appendix A for sample letters for Agreement State followup IMPEP reviews on FSME website/IMPEP toolbox](#).)

E. Preparation for Followup IMPEP Reviews

Guidance for review preparation can be found in FSME Procedure SA-100.

F. Entrance Meeting

Guidance for entrance meetings can be found in FSME Procedure SA-100.

G. On-site Review

1. Guidance for conducting the on-site portion of a review can be found in FSME Procedure SA-100. This guidance should be applied to only the specific indicators that are receiving a complete review.
2. Guidance for conducting the other aspects of the followup review can be found in FSME Procedure SA-116.

H. Third Party Attendance in Reviews

Guidance for third party attendance, such as public or media representatives, at reviews can be found in FSME Procedure SA-100.

I. Summarizing Review Findings

Guidance for summarizing review findings can be found in FSME Procedure SA-100.

J. Draft Reports

1. The review team members should complete their assigned sections of the draft report and submit them to the team leader within 7 calendar days of the exit meeting (NOTE: Calendar days, not work days). Any changes to this working schedule should be agreed upon between the team leader and the IMPEP Project Manager.
2. The team leader is responsible for integrating the information from the team members, preparing the draft report, and submitting both, the followup IMPEP draft report and transmittal letter or memorandum to the IMPEP Project Manager within 17 calendar days of the exit meeting. ~~(See sample draft report transmittal letter and boiler plate draft Agreement State followup report on FSME website/IMPEP toolbox). See Appendix B for sample draft report transmittal letter and boiler plate draft Agreement State followup report).~~
3. The draft followup report and transmittal letter, or memorandum, signed by the team leader should be dispatched to the State or Region within 30 calendar days following the exit meeting.
4. The administrative staff for the team leader will be responsible for the administrative aspects of the draft report. For the proposed final, if necessary and the final review report, ~~the Administrative Coordinators secretary, FSME, will be designated as lead secretary for that followup IMPEP review and~~ will work with the team leader in issuing the proposed final and final review reports.
5. The State or NRC Region will be requested to review the draft followup report and address any factual errors or misstatements within 4 weeks from receipt of the transmittal letter/memorandum.

K. Proposed Final Reports, MRB Meetings, Final Reports, and Followup Actions

1. The proposed final report and MRB meeting agenda will be submitted to the MRB at least seven days before the meeting. A copy of the Agreement State's or NRC Region's comments on the draft report will accompany the proposed final report. Specific guidance on the preparation of proposed final reports is contained in FSME Procedure SA-106.
2. An MRB meeting to discuss the followup IMPEP review findings will be held approximately 74 days after the exit meeting. Specific guidance on conducting MRB meetings is contained in FSME Procedure SA-106.

3. Issuance of Final Reports and Followup Actions

- a. The IMPEP Project Manager, in consultation with the team leader, is responsible for preparation of the final review report and letter for the Deputy Executive Director for Materials, Waste, Research, State, Tribal and Compliance Programs signature. (~~See sample letters for Agreement State followup IMPEP reviews on FSME website/IMPEP toolbox~~~~See Appendix C for a sample letter to issue final reports.~~).
- b. Additional guidance on the issuance of final reports and followup actions can be found in FSME Procedure SA-100, Appendix C.
- c. Responses to comments in the followup final report will be evaluated by the team leader in consultation with the review team and IMPEP Project Manager, as needed.
- d. An acknowledgment letter shall be prepared by the team leader for review and signature by Deputy Executive Director for Materials, Waste, Research, State, Tribal, and Compliance Programs within 30 days after the team leader receives the State or NRC Regional responses. (~~See sample letters for Agreement State followup IMPEP reviews on FSME website/IMPEP toolbox~~~~See Appendix D.~~).

VI. APPENDICES

~~Appendix A — Sample letter scheduling a followup IMPEP review.~~
~~Appendix B — Sample transmittal letter and boilerplate draft followup report.~~
~~Appendix C — Sample letter for final report.~~
~~Appendix D — Sample acknowledgment letter.~~
Appendix EA - Frequently Asked Questions

VII. REFERENCES

1. NRC Management Directive 5.6, *Integrated Materials Performance Evaluation Program*.
2. NRC Management Directive 5.10, *Formal Qualifications for Integrated Materials Performance Evaluation Program (IMPEP) Team Members*.
3. FSME Procedure SA-100, *Implementation of the Integrated Materials Performance Evaluation Program (IMPEP)*.
4. FSME Procedure SA-106, *The Management Review Board*.
5. FSME Procedure SA-116, *Periodic Meetings ~~with Agreement States~~ Between IMPEP Reviews*.
6. FSME Procedure SA-122, *Heightened Oversight and Monitoring*.

VII. 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. The previous revisions of SA-119 and correspondence can be found in the Agencywide Documents Access and Management System (ADAMS) as follows:

No.	Date	Document Title/Description	Accession Number
1	11/07/02	STP-02-079, Opportunity to Comment on Draft Revisions to STP Procedure SA-119	ML023110511
2	11/07/02	Memorandum to M.Virgilio et al re:Draft STP Procedure SA-119	ML023110521
3	11/07/02	Responses to STP-02-079	ML031740410
4	04/04/03	Summary of Comments on SA-119	ML031710815
5	4/4/03	STP Procedure SA-119, <i>Followup IMPEP Reviews</i>	ML031080582
6	2/22/07	FSME-07-020, Opportunity to Comment 5 Procedures (including SA-119)	ML070570341
7	9/25/07	Summary of Comments on SA-119	ML072610485
8	9/25/07	FSME Procedure SA-119, <i>Followup IMPEP Reviews</i>	ML072540828

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Appendix A

Frequently Asked Questions

- Q: If I'm on the review team for a program that is to receive a followup review, will I automatically be on the followup review team?
- A: No. Original team members do not come back to participate on the followup review. Only the RSAO for the State is required to participate in the followup review for an Agreement State. New team members are appointed to participate in followup IMPEP reviews since this approach allows for unbiased perspectives on Program past or present performance issues.
- Q: Will a followup review always follow a period of Heightened Oversight?
- A: Generally, a followup review will follow a period of Heightened Oversight, although the findings of the followup review may not necessarily lead to the end of the Heightened Oversight period.
- Q: How long do I need to hold on to my review materials once the review is over?
- A: Normally, we ask that team members retain their review materials only until the final report is issued. However, if a followup review is scheduled, team member should retain their materials until the followup review report has been issued.
- Q: What recommendations can be closed out during a followup review?
- A: Any recommendations from previous IMPEP reviews can be closed out if they are fully evaluated during a followup IMPEP review.