

STP Procedure Approval

Implementation of Management Directive 5.10, "Formal Qualifications for IMPEP Team Members" **SA-111**

Issue Date: December 1 , 2000

Expiration Date: December 1 , 2002

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Date: 12/01/2000

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Date: 11/22/2000

NOTE

The STP Director's Secretary is responsible for the maintenance of this master copy document as part of the STP Procedure Manual. Any changes to the procedure will be the responsibility of the STP Procedure Contact. Copies of STP procedures will be distributed for information.

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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 State and Tribal Programs (STP) through the use of a written qualification guide for STP IMPEP team members and team leaders.

III. BACKGROUND


NRC conducts periodic assessments of Agreement State radiation control 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, 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 Regional and State materials program reviews that are technically correct and in accordance with NRC policies and procedures. To facilitate implementation of this directive, an IMPEP Qualification Form and IMPEP Qualification Guides have been prepared (see Appendix A and Appendix B).

IV. ROLES AND RESPONSIBILITIES

A. Director, STP.

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. Sign the IMPEP Qualification Form for each IMPEP participant.

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B. Senior Project Manager for IMPEP Coordination.

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

C. IMPEP Team Member.

1. Using IMPEP Qualification Guides, document 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. Prepare and sign the IMPEP Qualification Form.
3. Review and update the IMPEP Qualification Form and supporting IMPEP Qualification Guide to reflect all changes in qualification.

V. GUIDANCE

A. Documenting Qualifications.

1. Each IMPEP team member should complete an IMPEP Qualification Guide for each indicator 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.
3. The 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) 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, STP. All principal reviewer and team leader qualifications should be documented by the Director, STP.



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5. A copy of each completed form and guide should be given to the senior project manager for IMPEP coordination.

B. Updating Qualifications.

1. Each time a new course is completed or new qualification is achieved, the 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 on a refresher training page and attached to the team member's appropriate qualification guide.

VI. APPENDICES

Appendix A - IMPEP Qualification Form

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

VII. REFERENCES

1. NRC Management Directive 5.10, "Formal Qualifications for IMPEP Team Members."
2. NRC Management Directive 5.6, "Integrated Materials Performance Evaluation Program (IMPEP)."

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)

☐ TEAM LEADER

NON-COMMON PERFORMANCE INDICATORS

COMMON PERFORMANCE INDICATORS

- ☐ Status of Materials Inspection Program
- ☐ Technical Quality of Materials Inspection
- ☐ Technical Staffing and Training
- ☐ Technical Quality of Licensing Actions
- ☐ Response to Incidents and Allegations:
Incident Response Limited Review
- ☐ Response to Incidents and Allegations:
Allegation Response Limited Review

- ☐ Legislation and Program Elements Required for
Compatibility
- ☐ Sealed Source and Device Evaluation Program:
Full Technical Review
- ☐ Sealed Source and Device Evaluation Program:
Limited Scope Review
- ☐ Low-Level Radioactive Waste Disposal Program
- ☐ Uranium Recovery Program
- ☐ 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 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: _____

Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
A. CORE TRAINING		
IMPEP Training		
B. SUPPLEMENTAL TRAINING		
N/A		
C. REFRESHER TRAINING		
IMPEP Training		

Formal Experience as Described in MD 5.10	COMPLETED? (Y/N)
D. SELF-STUDY	
NRC Orientation	
NRC Management Directive 5.6, "Integrated Materials Performance Evaluation Program (IMPEP)"	
10 CFR 19/20	
10 CFR 30-36/39	
10 CFR 40/70/71	
10 CFR 150	
Final Statement of Principle and Policy for the Agreement State Programs	
Final Policy Statement on Adequacy and Compatibility of Agreement State Programs	
E. PROFESSIONAL EXPERIENCE - 2 years experience with a radioactive materials program before and within 5 years of participating in IMPEP	

Alternative Qualifications/Comments: _____

Appendix B (continued)

STATUS OF MATERIALS INSPECTION PROGRAM PRINCIPAL REVIEWER

STAFF NAME:

Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
A. CORE TRAINING		
N/A		
B. SUPPLEMENTAL TRAINING		
Fundamentals of Inspection (G-101) or Inspection Procedures (G-108)		
Inspecting for Performance - Materials Version (G-304)		
Root Cause/Incident Investigation Workshop (G-205)		
C. REFRESHER TRAINING		
N/A		

Formal Experience as Described in MD 5.10	COMPLETED? (Y/N)
D. SELF-STUDY	
NRC IMC 2800, "Materials Inspection Program"	
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	
NRC IMC 0610, "Inspection Reports"	
E. PROFESSIONAL EXPERIENCE - 2 years experience with a radioactive materials program before and within 5 years of participating in IMPEP	

Alternative Qualifications/Comments: _____

Appendix B (continued)

TECHNICAL QUALITY OF INSPECTIONS PRINCIPAL REVIEWER

STAFF NAME:

Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
A. CORE TRAINING		
Fundamentals of Inspection (G-101) or Inspection Procedures (G-108)		
Root Cause/Incident Investigation Workshop (G-205)		
Inspecting for Performance Course - Materials Version (G-304)		
Applied Health Physics (H-109) or Health Physics Technology (H-201)		
Diagnostic and Therapeutic Nuclear Medicine (H-304)		
Safety Aspects of Industrial Radiography (H-305)		
Transportation of Radioactive Materials (H-308)		
Teletherapy and Brachytherapy (H-313)		
B. SUPPLEMENTAL TRAINING		
Environmental Monitoring for Radioactivity (H-111)		
Air Sampling for Radioactive Materials (H-119)		
Radiological Surveys in Support of Decommissioning (H-120)		
Respiratory Protection (H-311)		
Internal Dosimetry & Whole Body Counting (H-314)		
Safety Aspects of Well Logging (H-314)		
Irradiator Technology (H-315)		
C. REFRESHER TRAINING		
Fundamentals of Inspection Refresher (G-102)		
Health Physics Topical Review (H-401)		

Appendix B (continued)

Formal Experience as Described in MD 5.10	COMPLETED? (Y/N)
<i>D. SELF-STUDY</i>	
NRC IMC 2800, “Materials Inspection Program”	
NRC IMC 1220, “Processing of NRC Form 241,” Report of Proposed Activities in Non-Agreement States, and Inspection of Agreement State licensees operating under 10 CFR 150.20	
NRC IMC 0610, “Inspection Reports”	
NRC Inspection Procedure 87100 Series, “License Materials Programs”	
All applicable instructions related to materials programs	
<i>E. PROFESSIONAL EXPERIENCE - 2 years as an independent inspector before and within 5 years of participating in IMPEP</i>	

Alternative Qualifications/Comments: _____

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TECHNICAL STAFFING AND TRAINING

Appendix B (continued)

PRINCIPAL REVIEWER

STAFF NAME:

Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
A. CORE TRAINING		
N/A		
B. SUPPLEMENTAL TRAINING		
Root Cause/Incident Investigation Workshop (G-205)		
C. REFRESHER TRAINING		
N/A		

Formal Experience as Described in MD 5.10	COMPLETED? (Y/N)
D. SELF-STUDY	
NRC IMC 1246, "Formal Qualification Programs in the Nuclear Material Safety and Safeguards Program Area"	
NRC/Organization of Agreement States Training Working Group Recommendations for Agreement State Training Programs	
E. PROFESSIONAL EXPERIENCE - 2 years experience with a radioactive materials program before and within 5 years of participating in IMPEP	

Alternative Qualifications/Comments: _____

TECHNICAL QUALITY OF LICENSING ACTIONS

Appendix B (continued)

PRINCIPAL REVIEWER

STAFF NAME:

Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
A. CORE TRAINING		
Licensing Practices and Procedures (G-109)		
Applied Health Physics (H-109) or Health Physics Technology (H-201)		
Diagnostic and Therapeutic Nuclear Medicine (H-304)		
Safety Aspects of Industrial Radiography (H-305)		
Transportation of Radioactive Materials Course (H-308)		
Teletherapy and Brachytherapy (H-313)		
B. SUPPLEMENTAL TRAINING		
Fundamentals of Inspection (G-101) or Inspection Procedures (G-108)		
Root Cause/Incident Investigation Workshop (G-205)		
Environmental Monitoring for Radioactivity (H-111)		
Air Sampling for Radioactive Material (H-119)		
Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) (H-121)		
Respiratory Protection (H-131)		
Internal Dosimetry & Whole Body Counting (H-314)		
Safety Aspects of Well Logging (H-314)		
Irradiator Technology (H-315)		
C. REFRESHER TRAINING		
Health Physics Topical Review (H-401)		

Appendix B (continued)

Formal Experience as Described in MD 5.10	COMPLETED? (Y/N)
<i>D. SELF-STUDY</i>	
NRC IMC 2800, “Materials Inspection Program”	
NRC IMC 1220, “Processing of NRC Form 241,” Report of Proposed Activities in Non-Agreement States, and Inspection of Agreement State licensees operating under 10 CFR 150.20	
NRC Inspection Procedure 87100 Series, “License Materials Programs”	
<i>E. PROFESSIONAL EXPERIENCE - 2 years as an independent license reviewer before and within 5 years of participating in IMPEP</i>	

Alternative Qualifications/Comments: _____

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

STAFF NAME:

Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
A. CORE TRAINING		
Fundamentals of Inspection (G-101) or Inspection Procedures (G-108)		
Root Cause/Incident Investigation Workshop (G-205)		
Applied Health Physics (H-109) or Health Physics Technology (H-201)		
Diagnostic and Therapeutic Nuclear Medicine (H-304)		
Safety Aspects of Industrial Radiography (H-305)		
Transportation of Radioactive Materials (H-308)		
Teletherapy and Brachytherapy (H-313)		
B. SUPPLEMENTAL TRAINING		
Environmental Monitoring for Radioactivity (H-111)		
Air Sampling for Radioactive Material (H-119)		
Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) (H-121)		
Respiratory Protection (H-131)		
Internal Dosimetry & Whole Body Counting (H-314)		
Safety Aspects of Well Logging (H-314)		
Irradiator Technology (H-315)		
C. REFRESHER TRAINING		
Fundamentals of Inspection Refresher (G-102)		
Health Physics Topical Review (H-401)		

Appendix B (continued)

Formal Experience as Described in MD 5.10	COMPLETED? (Y/N)
<i>D. SELF-STUDY</i>	
NRC MD 8.2, “NRC Incident Response Program”	
NRC MD 8.3, “NRC Incident Investigation Program”	
NRC IMC 2800, “Materials Inspection Program”	
NUREG-1303, “Incident Investigation Manual”	
Handbook on Nuclear Materials Event Reporting in the Agreement States	
Nuclear Materials Event Database (NMED)	
<i>E. PROFESSIONAL EXPERIENCE - some involvement with incident response before and within 5 years of participating in IMPEP</i>	

Alternative Qualifications/Comments: _____

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

STAFF NAME:

Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
A. CORE TRAINING		
N/A		
B. SUPPLEMENTAL TRAINING		
Root Cause/Incident Investigation Workshop (G-205)		
C. REFRESHER TRAINING		
N/A		

Formal Experience as Described in MD 5.10	COMPLETED? (Y/N)
D. SELF-STUDY	
NRC MD 8.8, "Management of Allegations"	
NRC Allegation Memoranda, 96-01, 96-02, and 98-01	
E. PROFESSIONAL EXPERIENCE - <i>some involvement with the resolution or management of allegations before and within 5 years of participating in IMPEP</i>	

Alternative Qualifications/Comments: _____

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LEGISLATION AND PROGRAM ELEMENTS REQUIRED FOR COMPATIBILITY PRINCIPAL REVIEWER

STAFF NAME:

Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
A. CORE TRAINING		
N/A		
B. SUPPLEMENTAL TRAINING		
Root Cause/Incident Investigation Workshop (G-205)		
C. REFRESHER TRAINING		
N/A		

Formal Experience as Described in MD 5.10	COMPLETED? (Y/N)
D. SELF-STUDY	
NRC MD 5.9, "Adequacy and Compatibility of Agreement State Programs"	
SA-200, "Compatibility Categories and Health & Safety Identification for NRC Regulations and Other Program Elements"	
E. PROFESSIONAL EXPERIENCE - <i>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</i>	

Alternative Qualifications/Comments: _____

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SEALED SOURCE AND DEVICE EVALUATION PROGRAM: LIMITED SCOPE TECHNICAL REVIEW PRINCIPAL REVIEWER

STAFF NAME:

Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
A. CORE TRAINING		
Sealed Source and Device Workshop		
Applied Health Physics (H-109) or Health Physics Technology (H-201)		
B. SUPPLEMENTAL TRAINING		
Root Cause/Incident Investigation Workshop (G-205)		
Diagnostic and Therapeutic Nuclear Medicine (H-304)		
Safety Aspects of Industrial Radiography (H-305)		
Teletherapy and Brachytherapy (H-313)		
Safety Aspects of Well Logging (H-314)		
C. REFRESHER TRAINING		
N/A		

Formal Experience as Described in MD 5.10	COMPLETED? (Y/N)
D. SELF-STUDY	
NUREG-1556, Vol. 3, "Consolidated Guidance About Materials Licenses"	
ANSI N538-1979, "Classification of Industrial Ionizing Radiation Gauging Devices"	
ANSI N542-1977, "Sealed Radioactive Source Classification"	
Regulatory Guide 6.9, "Establishing Quality Assurance Programs for the Manufacture and Distribution of Sealed Sources and Devices Containing Byproduct Material"	
E. PROFESSIONAL EXPERIENCE - 5 years experience with a radioactive materials program before and within 10 years of participating in IMPEP	

Alternative Qualifications/Comments: _____

LOW-LEVEL RADIOACTIVE WASTE DISPOSAL PROGRAM

Appendix B (continued)

PRINCIPAL REVIEWER

STAFF NAME:

Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
A. CORE TRAINING		
N/A		
B. SUPPLEMENTAL TRAINING		
Root Cause/Incident Investigation Workshop (G-205)		
C. REFRESHER TRAINING		
N/A		

Formal Experience as Described in MD 5.10	COMPLETED? (Y/N)
D. SELF-STUDY	
NUREG-1199, "Standard Format & Content of a License Application for a Low-Level Radioactive Waste Disposal Facility"	
NUREG-1200, "Standard Review Plan for the Review of a License Application for a Low-Level Radioactive Disposal Facility"	
NUREG-1274, "Review Process for Low-Level Radioactive Waste Disposal License Applications Under Low-level Radioactive Waste Policy Amendments Act"	
NRC IMC 2401, "Near Surface Low-Level Radioactive Waste Disposal Facility Evaluation Program"	
Draft Branch Technical Position, "Low-Level Radioactive Waste Performance Assessment"	
10 CFR Part 61	
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	

Alternative Qualifications/Comments: _____

URANIUM RECOVERY PROGRAM
PRINCIPAL REVIEWER

Appendix B (continued)

STAFF NAME:

Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
A. CORE TRAINING		
N/A		
B. SUPPLEMENTAL TRAINING		
Root Cause/Incident Investigation Workshop (G-205)		
C. REFRESHER TRAINING		
N/A		

Formal Experience as Described in MD 5.10	COMPLETED? (Y/N)
D. SELF-STUDY	
10 CFR Part 40, Appendix A	
NUREG-1569, "Standard Review Plan for In Situ Leach Uranium Extraction License Applications"	
NUREG-1620, "Standard Review Plan for the Review of a Reclamation Plan for Mill Tailings Sites Under Title II of the Uranium Mill Tailings Radiation Control Act"	
NRC IMC 2801, "Uranium Mill and 11e.(2) Byproduct Material Disposal Site and Facility Inspection Program"	
NRC IMC 2641, "In Situ Leach Facility Inspection Program"	
E. PROFESSIONAL EXPERIENCE - 2 years working as an inspector, license reviewer, or as a developer of regulatory programs for ensuring safety of uranium recovery operations before and within 5 years of participating in IMPEP	

Alternative Qualifications/Comments: _____

TEAM LEADER QUALIFICATIONS

Appendix B (continued)

STAFF NAME:

Formal Courses as Described in MD 5.10	COMPLETED? (Y/N)	COURSE DATE
A. CORE TRAINING		
Fundamentals of Inspection (G-101) or Inspection Procedures (G-108)		
Licensing Practices and Procedures (G-109)		
Inspection for Performance - Materials Version (G-304)		
Applied Health Physics (H-109) or Health Physics Technology (H-201)		
Leading NRC Work Teams (PDC)		
B. SUPPLEMENTAL TRAINING		
Root Cause/Incident Investigation Workshop (G-205)		
Diagnostic and Therapeutic Nuclear Medicine (H-304)		
Safety Aspects of Industrial Radiography (H-305)		
Transportation of Radioactive Materials (H-308)		
Teletherapy and Brachytherapy (H-313)		
Safety Aspects of Well Logging (H-314)		
Irradiator Technology (H-315)		
Managing Other People's Writing (PDC)		
Situational Leadership (PDC)		
Effective Communications for NRC Inspectors (OP)		
IMPEP Leader Course		
C. REFRESHER TRAINING		
N/A		

Appendix B (continued)

Formal Experience as Described in MD 5.10	COMPLETED? (Y/N)
<i>D. SELF-STUDY</i>	
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	
NRC IMC 1246, “Formal Qualification Programs in the Nuclear Materials Safety and Safeguards Program”	
NRC IMC 2800, “Materials Inspection Program”	
NRC Management Directive 8.8, “Management of Allegations”	
<i>E. PROFESSIONAL EXPERIENCE</i>	
5 years experience with a radiation materials program before and within 10 years of participating in IMPEP	
Qualified to act as principal reviewer for at least one performance indicator	
Participation in one IMPEP review as a principal reviewer for any indicator	

Alternative Qualifications/Comments:_____

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REFRESHER TRAINING

Appendix B (continued)

STAFF NAME:

COURSE	COMPLETED? (Y/N)	COURSE DATE