

October 29, 2001

ALL AGREEMENT STATES  
MINNESOTA, PENNSYLVANIA, WISCONSIN

**PROGRAM MANAGEMENT INFORMATION: IDENTIFICATION OF GOOD PRACTICES  
AND TRENDS FROM FEBRUARY 2000 TO MARCH 2001 INTEGRATED MATERIALS  
PERFORMANCE EVALUATION PROGRAM (IMPEP) REVIEWS (STP-01-077)**

Enclosed are two reports prepared by Nuclear Regulatory Commission (NRC) staff. The first report (Enclosure 1) is on good practices which were identified during the Integrated Materials Performance Evaluation Program (IMPEP) reviews from 2000 in Louisiana, Georgia, Massachusetts, North Dakota, Kentucky, Tennessee, and North Carolina, and from 2001 in Colorado, Illinois, and NRC Region I. NRC staff is making this information available to both NRC Regions and the Agreement States to identify and share innovative and effective practices used to implement materials licensing and inspection programs throughout the nation. You may find some techniques used elsewhere that can be incorporated to enhance some aspect(s) of your own programs. We plan to continue to identify good practices through IMPEP reviews and to issue similar reports periodically.

The second report (Enclosure 2) summarizes in a general manner recommendations identified in more than one IMPEP review during this same period. This information is being provided for your use in identifying areas in the Atomic Energy Act materials programs that may need strengthening.

If you have any questions regarding this correspondence, please contact me or the individual named below.

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Enclosures:  
As stated

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INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM (IMPEP)  
GOOD PRACTICES IDENTIFIED DURING  
FEBRUARY 2000 - MARCH 2001 REVIEWS

## INTRODUCTION

The Integrated Materials Performance Evaluation Program (IMPEP) is used by the Nuclear Regulatory Commission (NRC) to review Agreement State and NRC Regional materials regulatory programs. It provides a uniform approach for review of such programs and is based on five performance indicators that are common to Agreement State and Regional materials radiation control programs. The basic concept in IMPEP is that use of common performance indicators will allow NRC to conduct consistent reviews of Regional and Agreement State materials programs that focus on performance. These indicators are as follows:

- Status of Materials Inspections Program
- Technical Quality of Inspections
- Technical Staffing and Training
- Technical Quality of Licensing Actions
- Response to Incidents and Allegations

Certain non-reactor functions that continue to be conducted from NRC Headquarters, such as fuel cycle licensing, uranium and thorium milling licensing, sealed source and device reviews, and low-level radioactive waste disposal licensing, are excluded from the set of common indicators because they are not common to Regional and Agreement State activities. These are incorporated, as appropriate, as non-common indicators contributing to a performance-based evaluation of the program. For Agreement States, the non-common indicators are legislation and program elements required for compatibility, sealed source and device (SS&D) evaluation program, low-level radioactive waste disposal program and uranium recovery program.

## PURPOSE

This report provides a summary of good practices identified during IMPEP reviews of one NRC Regional office and nine Agreement States conducted from February 2000 to March 2001. This summary is being shared with Regional and Agreement State program managers throughout the nation for your consideration as to whether your programs might be enhanced by adopting the good practices of other regulators. The previous good practice reports are contained in the All Agreement States letters as follows (located on the STP Home Page):

SP-96-081, dated July 17, 1996:

<http://www.hsrdrnrl.gov/nrc/agstates/program/sp96081.pdf>

SP-97-081, dated November 21, 1997:

<http://www.hsrdrnrl.gov/nrc/agstates/program/SP97081.pdf>

SP-99-011, dated February 22, 1999:

<http://www.hsrdrnrl.gov/nrc/agstates/program/SP99011.pdf>

STP-00-039, dated May 3, 2000:

<http://www.hsrdrnrl.gov/nrc/agstates/program/sp00039.pdf>

ENCLOSURE 1

### SEALED SOURCE AND DEVICE PROGRAM

The review team identified the Georgia program's policy of conducting quality assurance and quality control inspections on all SS&D registrants to ensure accuracy and consistency in the production of sources and devices as a good practice.

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### URANIUM RECOVERY

Based on the extended usefulness of Colorado's photo documentation of decommissioning construction activities, the review team identified this to be a good practice.

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RECOMMENDATIONS IDENTIFIED IN MORE THAN ONE REVIEW  
COMPLETED FROM FEBRUARY 2000 - MARCH 2001 UNDER THE  
INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM

## INTRODUCTION

The Integrated Materials Performance Evaluation Program (IMPEP) is the Nuclear Regulatory Commission's (NRC's) approach to review Agreement State and NRC Regional materials radiation control programs. This report provides a summary of recommendations identified in more than one IMPEP review completed from February 2000 to March 2001 of one Regional office and nine Agreement States. This summary is being shared with Regional and Agreement State program managers for your consideration as to whether these weakness may be present in your programs. Reports of the completed IMPEP reviews completed during 1999 for the Agreement States can be located on the Office of State and Tribal Programs (STP) Home Page (<http://www.hsrn.gov/nrc/>). Both the Regional and Agreement State reviews are available through the NRC public document room. There are also All Agreement States letters on the same subject (located on the STP Home Page):

SP-97-081, dated November 21, 1997:

<http://www.hsrn.gov/nrc/agstates/program/SP97081.pdf>

SP-99-011, dated February 22, 1999:

<http://www.hsrn.gov/nrc/agstates/program/SP99011.pdf>

STP-00-039, dated May 3, 2000

<http://www.hsrn.gov/nrc/agstates/program/sp00039.pdf>

## STATUS OF MATERIALS INSPECTIONS

Recommendations were made to inspect licenses at the appropriate frequency.

## TECHNICAL STAFFING AND TRAINING

Recommendations were made to develop and document a training and qualification program that addresses the training requirements in IMC 1246 or the NRC/OAS Training Working Group Report.

## TECHNICAL QUALITY OF LICENSING ACTIONS

Recommendations were made to review all licensees to ascertain if financial assurance is required.

## RESPONSE TO INCIDENTS AND ALLEGATIONS

Recommendations were made to report all significant events to the NRC in accordance with STP Procedure SA-300.

## LEGISLATION AND PROGRAM ELEMENTS REQUIRED FOR COMPATIBILITY

Recommendations were made to adopt the regulations, or other legally-binding requirements, needed for compatibility, in accordance with current policy on adequacy and compatibility.