

November 7, 2002

ALL AGREEMENT STATES, MINNESOTA, PENNSYLVANIA, WISCONSIN

OPPORTUNITY TO COMMENT ON DRAFT STP PROCEDURE SA-119, "FOLLOW-UP IMPEP REVIEWS" (STP- 02-079)

Enclosed for your review and comment* is the draft Office of State and Tribal Programs (STP) Procedure SA-119, "Follow-up IMPEP Reviews." This procedure describes the process to be used by Integrated Material Performance Evaluation Program (IMPEP) teams for Preparing, conducting and reporting results of follow-up IMPEP reviews of NRC Regional and Agreement State materials program. This is a new draft procedure. We would appreciate receiving your comments within 30 days from the date of this letter.

Thank you for your attention to this matter. If you have any questions regarding this correspondence, please contact me on 301-415-3340 or the individual named below.

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/RA/

Paul H. Lohaus, Director
Office of State and Tribal Programs

Enclosure:
As stated

* This information request has been approved by OMB 3150-0029, expiration 06/30/04. The estimated burden per response to comply with this voluntary collection is approximately 6 hours. Forward any comments regarding the burden estimate to the Information and Records Branch (T-6F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0029), Office of Management and Budget, Washington, DC 20503. If a document does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information.

STP-02-079

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STP Procedure Approval
Follow-up IMPEP Reviews

SA-119

Issue Date:

Review Date:

Paul H. Lohaus
Director, STP

Date:

Josephine M. Piccone
Deputy Director, STP

Date:

Kathleen N. Schneider
Procedure Contact, STP

Date:

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.



Procedure Title:
Follow-up IMPEP Reviews
Procedure Number: SA-119

Page: 1 of
Issue Date:

I. INTRODUCTION

- A. This document describes the procedures for conducting follow-up reviews of NRC Regional and Agreement State materials programs under the Integrated Materials Performance Evaluation Program (IMPEP), including scheduling, assigning personnel for, and reporting the results of the reviews
- B. Depending on the findings of an IMPEP review, the Management Review Board (MRB) may direct that a follow-up IMPEP review take place. The scope of the follow-up 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 follow-up IMPEP reviews of NRC Regional and Agreement State materials programs.

III. BACKGROUND

NRC Regional and Agreement State materials programs are reviewed at least every four years under IMPEP. The MRB may direct that a follow-up review be conducted prior to the standard four-year interval. A follow-up review will normally occur 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 with recommendations for improvement or unsatisfactory during the last IMPEP review. The follow-up 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 follow-up 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 follow-up review, the team is also responsible for completing all elements of a periodic meeting as described in STP Procedure SA-116

IV. ROLES AND RESPONSIBILITIES

STP is the lead office responsible for coordination of Agreement State follow-up IMPEP reviews. The Office of Nuclear Materials Safety and Safeguards (NMSS) is the lead office responsible for coordination of NRC Regional follow-up IMPEP reviews.

A. MRB.

1. Provides direction, usually through a prior IMPEP review finding, or review of the results of a periodic meeting on the need for a follow-up review.
2. For follow-up reviews where an MRB meeting is held to review follow-up IMPEP review findings, the roles and responsibilities of the MRB and the guidelines to be followed by the MRB are the same as those detailed in STP Procedure SA-106, *Management Review Board*.
3. For follow-up reviews where an MRB meeting is not held, MRB members are responsible for reviewing and concurring on the final follow-up IMPEP report usually within two weeks. The Deputy Executive Director for Materials, Research, and State Programs will sign out the final follow-up IMPEP report.

B. Director, STP:

1. Attends Agreement State follow-up IMPEP review exit meetings or designates the Deputy Director, STP to attend;
2. Acts as an MRB member per STP Procedure SA-106, *Management Review Board*, and concurs on final follow-up IMPEP reports.

C. Deputy Director, STP:

1. Attends Agreement State IMPEP review exit meetings as designated by the Director, STP;
2. If an MRB meeting is held, signs out Agreement State follow-up review proposed final reports to the MRB per STP Procedure SA-106.
3. If an MRB meeting is not held, concurs on issuance of the Agreement State final follow-up review report to the MRB per STP Procedure SA-106.

D. IMPEP Project Manager, STP:

1. Reviews and provides feedback on all Agreement State follow-up IMPEP reports to both the IMPEP team leader and STP management;
2. Coordinates MRB meetings per STP Procedure SA-106, as necessary.

E. Director, NMSS:

1. Designates the appropriate NMSS division director(s) to attend NRC Regional follow-up IMPEP review exit meetings;
2. Acts as an MRB member per STP Procedure SA-106 and concurs on final follow-up IMPEP reports.

F. Director, Division of Industrial and Medical Nuclear Safety (IMNS);

1. Attends NRC Regional IMPEP review exit meetings, as designated;
2. If an MRB meeting is held, signs out the NRC Regional follow-up review proposed final reports to the MRB per STP Procedure SA-106.
3. If an MRB meeting is not held, concurs on issuing NRC Regional final follow-up review report to the MRB per STP Procedure SA-106.

G. NMSS IMPEP Contact:

1. Coordinates Regional MRB meetings per STP Procedure SA-106.

H. IMPEP Team Leader:

1. Coordinates and conducts assigned follow-up IMPEP reviews;
2. Completes the IMPEP report in accordance with Management Directive (MD) 5.6, *Integrated Materials Performance Evaluation Program (IMPEP)*, STP Procedure SA-106, and this procedure;
3. Designates an IMPEP team member to act as principal reviewer for each applicable performance indicator;
4. Signs out draft follow-up IMPEP reports to Agreement States;
5. Presents review findings at an MRB meeting if a MRB meeting is conducted.
6. Prepare the final follow-up review report for transmittal to the MRB per STP Procedure SA-106, if an MRB meeting is not convened.

- I. Regional State Agreement Officer (RSAO):
 - 1. Completes the review of their assigned indicator(s) in accordance with the applicable STP procedures and writes their assigned section(s) of the follow-up IMPEP report;
 - 2. Ensures the periodic meeting portion of the follow-up IMPEP review is completed and prepares the meeting summary, as necessary;
 - 3. Presents review findings at an MRB meeting, if a MRB meeting is convened.
- J. IMPEP Team Member:
 - 1. Completes the review of their assigned indicator(s) in accordance with the applicable STP procedures and writes their assigned section(s) of the follow-up IMPEP report;
 - 2. Presents review findings at the MRB meeting, if a MRB meeting is convened.

V. GUIDANCE

- A. Scope of Follow-up IMPEP Reviews:
 - 1. The follow-up review will include a complete review of one or more of the common and/or non-common performance indicators. Normally, these are indicators where the previous IMPEP review resulted in findings of “satisfactory with recommendations for improvements” or “unsatisfactory.” A review of the program’s response to previous IMPEP review recommendations dealing with these indicators may be closed out by the IMPEP team and MRB. The team may also make recommendations for changes to review findings for these indicators.
 - 2. For Agreement State follow-up reviews, the radiation control program must also be considered as a whole, even during a limited scope follow-up review. To accomplish this goal, the meeting agenda in STP 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 follow-up review is conducted). Consistent with the periodic meeting procedure, though all common and applicable non-common performance indicators should be discussed, recommendations should only be closed for indicators that are fully reviewed and evaluated by the team as a part of the follow-up review.

3. A radiation control program experiencing serious difficulties because of the loss of key staff, loss of operating funds, or other acute problems may receive a follow-up IMPEP review that focuses on all aspects of the program. All common and applicable non-common performance indicators will be reviewed during a full follow-up IMPEP review. A follow-up 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 Follow-up IMPEP Reviews

1. With the exception of the RSAO, team members should be different from those who conducted the previous IMPEP review. For Agreement State follow-up IMPEP reviews, the RSAO will be a member of the follow-up review team.
2. Assignment of staff to specific performance indicators will be according to 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.
4. The criteria for selecting team members established in STP Procedure SA-100, *Integrated Materials Performance Evaluation Program (IMPEP)*, should be followed in choosing team members for a follow-up review.

C. Scheduling Follow-up IMPEP Reviews

Follow-up review scheduling should be completed along with routine scheduling as detailed in STP Procedure SA-100 and should follow the time frame reflected in the previous final IMPEP report or as directed by the MRB. Follow-up reviews are normally performed approximately one year following either the previous IMPEP review 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 follow-up 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 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 closeout meeting should take place on the final day of the review.
- b. For Agreement States, copies of the letter should be sent to team members, IMPEP Project Manager, NRC Regional State Liaison Officer, RSAO, and the Director, STP.

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.

E. Preparation For Follow-up IMPEP Reviews

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

F. Entrance Meeting

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

G. On-site Review

1. Guidance for conducting the on-site portion of a review can be found in STP 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 follow-up review can be found in STP Procedure SA-116, Periodic Meetings with Agreement States

H. Third Party Attendance in Reviews

Guidance for third party attendance at reviews can be found in STP Procedure SA-100.

I. Summarizing Review Findings

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

J. Draft Reports

1. The team leader is responsible for preparing the draft report following a follow-up IMPEP review.
2. For Agreement States:
 - a. The review team members should complete their portions of the draft report and submit them to the team leader within 7 days of the exit meeting (NOTE: Calendar days, not work days).
 - b. The team leader is responsible for integrating the information from the team members and submitting both the follow-up IMPEP draft report and letter to the State requesting factual comments to IMPEP Project Manager, within 17 days of the exit meeting.
 - c. The draft follow-up report and cover letter should be dispatched within 30 days following the exit meeting. The review report shall be prepared by the team leader for concurrence by STP, and shall be signed out by the team leader.
 - d. A secretary, STP will be designated as lead secretary for that follow-up IMPEP review and will work with the team leader.
3. For NRC Regions:
 - a. The review team should complete their portions of the draft report and submit them to the team leader within 5 calendar days of the exit meeting.
 - b. The team leader is responsible for integrating the information from the team members and submitting both the IMPEP draft report and letter to the Region requesting factual comments to the Division Director, IMNS within 7 days of the exit meeting.

- c. The draft follow-up report and cover letter should be dispatched within 30 days following the exit meeting. The draft follow-up review report shall be prepared by the team leader for concurrence by IMNS, and shall be signed out by the team leader.
 - 4. The State or NRC Region will be requested to review the draft follow-up report and address any factual errors or misstatements within 30 days.
- K. Proposed Final Reports, MRB Meetings, Final Reports, and Follow-up Actions
 - 1. An MRB meeting should be held in association with a follow-up IMPEP review if:
 - a. The follow-up IMPEP review covered all indicators;
 - b. The program under review did not make sufficient progress towards making program improvements or has experienced additional or more severe problems in performance or;
 - c. The follow-up IMPEP review revealed substantial changes in program performance such as a change in an indicator rating.
 - 2. For follow-up reviews where an MRB meeting is not held:
 - a. The team leader will prepare the final IMPEP report for concurrence by the MRB members and signature by Deputy Executive Director for Materials, Research, and State Programs.
 - b. This report will be distributed to the MRB members, including an Agreement State Liaison with a two week deadline for comments/concurrence. If a questionnaire was used, a copy of the completed questionnaire will be included as background with the concurrence package.
 - c. The specific guidance on the issuance of final reports and follow-up actions found in STP Procedure SA-100 may be used once concurrence has been achieved.
 - 3. For follow-up reviews where an MRB meeting is held:
 - a. Upon review of the State or Region response to the draft report, the team leader will be responsible for making any appropriate corrections,

developing a team recommendation regarding the program for the MRB, and submitting the proposed final report to the MRB for its consideration. If the comments are extensive, a separate comment resolution document should be prepared by the team leader for submittal to the MRB. Contact the IMPEP Project Manager for additional guidance on format.

- b. The lead secretary, STP will schedule the MRB for Agreement State reviews in consultation with the team leader per STP Procedure SA-106. A copy of the State's or NRC Region's comments on the draft report will accompany the proposed final report presented to the MRB.
- c. Specific guidance on conducting MRB meetings and the preparation of proposed final reports is contained in STP Procedure SA-106.
- d. Specific guidance on the issuance of proposed final and final reports, and follow-up actions can be found in STP Procedure SA-100.

VI. APPENDICES

Appendix A - Sample letter scheduling a follow-up IMPEP review.
Appendix B - Sample draft report cover letter and boilerplate draft follow-up report.
Appendix C - Sample letter for final report.
Appendix D - Sample acknowledgment letter.
Appendix E - 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. STP Procedure SA-100, *Integrated Materials Performance Evaluation Program (IMPEP)*.
3. STP Procedure SA-106, *Management Review Board*.
4. STP Procedure SA-122, *Heightened Oversight and Monitoring (to be developed)*.

Appendix A

Sample Letter Scheduling a Follow-Up IMPEP Review

[RADIATION CONTROL PROGRAM DIRECTOR]

Dear [*Radiation Control Program Director*]:

As you are aware, NRC is using the Integrated Materials Performance Evaluation Program (IMPEP) for the evaluation of Agreement State Programs. Per our discussion, I will be the team leader for the follow-up IMPEP review of the [STATE] program scheduled for the week of [DATE]. The team will include [*Names of IMPEP team members, Title, NRC or State affiliation*].

On [DATE OF ORIGINAL MRB MEETING] the Management Review Board (MRB) met to consider the proposed final IMPEP report on the [STATE] Agreement State Program. During the meeting, the MRB directed that a follow-up review be conducted in [TIME FRAME] that focused on the State's [*complete program or INDICATOR(S) BEING REVIEWED*].

In accordance with the MRB's recommendation, the scope of this follow-up review will be limited to an assessment and evaluation of your [*INDICATOR(S) BEING REVIEWED*]. In addition to a review of select casework completed since the [DATE OF LAST IMPEP REVIEW] IMPEP review, the team will review your actions in response to the [NUMBER] recommendations made for this/these indicator(s). Enclosed is an abridged version of the IMPEP questionnaire containing questions [*QUESTION NUMBERS*]. I ask that you send your responses by Internet ([*TEAM LEADER'S INTERNET ADDRESS*]) to me by [DATE - TWO WEEKS PRIOR TO THE REVIEW]. Also included with the questionnaire is a list of documents that the team requests be made available to facilitate its review.

The team will also discuss the actions that the [STATE] program has taken for the remaining recommendations from the [DATE OF LAST IMPEP REVIEW] IMPEP review. These discussions will not be a formal assessment of the balance of your Agreement State Program. The team will use this guidance in STP Procedure SA-116, "Periodic Meetings with Agreement States Between IMPEP Reviews," for conducting these discussions. This procedure was distributed to you and can also be found on the STP web site.

[OR]

Enclosed is the document, "Integrated Materials Performance Evaluation Program Questionnaire." The questionnaire is being furnished to you on a computer disk as well as in printed form. I ask that you send your responses by Internet to ([*TEAM LEADER'S INTERNET ADDRESS*]) or return the disk to me by [DATE - 2 WEEKS PRIOR TO REVIEW]. I am sending the document and disk in advance of the IMPEP review in order to provide time for you to allocate the staff resources necessary to complete the document by the due date. Part A of the questionnaire contains questions on the common performance indicators. Part B contains questions on the non-common performance indicators for Agreement States.

Also included with the questionnaire is the document "Materials Requested to Be Available for the Onsite Portion of an IMPEP Review." We encourage States to have the items listed prepared prior to the IMPEP team's arrival.

I request that you set up an appointment with the appropriate State Senior Management Official to discuss the results of the follow-up IMPEP review of the [STATE] program on [LAST DAY OF IMPEP REVIEW].

If you have questions, please call me at [team leader phone number].

Sincerely

[TEAM LEADER]

Enclosures:
As stated

cc: [STATE HEALTH OFFICER OR APPROPRIATE SENIOR STATE MANAGEMENT]

Distribution:

DCD (SP01) [Regional or Office distribution]

Appendix B

Sample Draft Report Cover Letter and Boilerplate Draft Follow-up Report

[NAME]
[TITLE, STATE SENIOR MANAGEMENT]
[ADDRESS]

Dear [NAME]:

Enclosed for your review is the draft follow-up Integrated Materials Performance Evaluation Program (IMPEP) report which documents the results of the Agreement State follow-up review held in your office on [DATES]. I was the team leader for the [STATE] review. The review team's preliminary findings were discussed with you and your staff on the last day of the review.

[SHORT DESCRIPTION OF THE CURRENT STATUS OF THE PROGRAM INCLUDING PROGRESS AND AREAS STILL IN NEED OF IMPROVEMENT]. The follow-up review team recommends that the [STATE] Agreement State program [FULL IMPEP REVIEW/FOLLOW-UP IMPEP REVIEW] in FY [YEAR].

In accordance with procedures for implementation of IMPEP, we are providing you with a copy of the draft follow-up IMPEP team report for review prior to submitting the report to the Management Review Board (MRB). We welcome your comments on the draft report. If possible, we request comments within four weeks from your receipt of this letter. This schedule will permit the issuance of the final report in a timely manner that will be responsive to your needs.

The team will review the response, make any necessary changes to the report and issue it to the MRB as a proposed final report. Our preliminary scheduling places the [STATE] MRB meeting in the [WEEK - 74 DAYS FROM THE REVIEW]. We will coordinate with you to establish the date for the MRB review of the [STATE] report and will provide invitational travel for you or your designee to attend. NRC has video conferencing capability if it is more convenient for the State to participate through this medium. We will work with your staff to establish a video conference if you so desire.

[OR]

The team will review the response, make any necessary changes to the report and issue it to the MRB as a final report.

If you have any questions concerning the IMPEP process for senior NRC management prior to the consideration by the MRB on the follow-up review results, please contact Paul Lohaus, Director, Office of State and Tribal Programs at (301) 415-3340. If you have any questions regarding the enclosed report, please contact me at [PHONE NUMBER].

Sincerely,

[Team Leader]

Enclosure:
As stated

cc: [NAME, RADIATION CONTROL PROGRAM, STATE]
[STATE LIAISON OFFICER]

Distribution:

DIR RF	DCD (SP01)
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Senior Program Analyst, NMSS PDR (YES√)

[IMPEP TEAM MEMBERS]

IMPEP Project Manager, STP

IMNS Director

ASPO

OGC

[STATE] File

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NAME	[TEAM LEADER]:								
DATE									

INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM
FOLLOW-UP REVIEW OF THE [STATE] AGREEMENT STATE PROGRAM

[DATES OF ON-SITE REVIEW]

DRAFT REPORT

U. S. Nuclear Regulatory Commission

1.0 INTRODUCTION

This report presents the results of the follow-up review of the [STATE RADIATION CONTROL PROGRAM], conducted [DATES OF ON-SITE REVIEW]. This follow-up review was directed by the Management Review Board (MRB) based on the results of the [DATES OF LAST FULL IMPEP REVIEW] Integrated Materials Performance Evaluation Program (IMPEP) review. The MRB directed that a follow-up review of the [ENTIRE PROGRAM OR LIST SPECIFIC INDICATORS], be conducted in one year based on the [DETAILS OF THE PROGRAM DEFICIENCIES]. [The follow-up review also included evaluation of actions taken by the State to address the {#} recommendations made during the {DATES OF LAST FULL IMPEP REVIEW} IMPEP review.]

The follow-up review was conducted by a review team consisting of technical staff members from the Nuclear Regulatory Commission (NRC) and the State of [STATE TEAM MEMBER'S HOME STATE]. Team members are identified in Appendix A. The follow-up review was conducted in accordance with the November 5, 1999, NRC Management Directive 5.6, "Integrated Materials Performance Evaluation Program (IMPEP)."

[A paragraph on the results of the MRB meeting, if convened will be included in the final report. If there is not a formal MRB meeting convened, a summary of the final results of the review will be included.]

[GIVE A SHORT DESCRIPTION OF THE IMPROVEMENTS/LACK OF IMPROVEMENTS SINCE THE LAST IMPEP REVIEW]

The [STATE] Agreement State program is administered by the [DETAILS ABOUT THE ORGANIZATION OF THE PROGRAM]. The organizational chart for the [PROGRAM] is presented in Appendix B. At the time of the follow-up review, the [STATE] program regulated approximately [#] specific licenses [INCLUDE ANY PERTINENT INFORMATION].

[Prior to the follow-up review, the NRC conducted a heightened oversight program for the {STATE} program. The program included {STATE} developing and submitting a program improvement plan in response to the {YEAR} IMPEP review, followed by bimonthly conference calls with NRC. Conference calls were held [DATES]. The communications for the heightened oversight program are in Appendix C to this IMPEP report. [STATE]'s actions and their status were reviewed in preparation for this follow-up review.]

The review team's approach for conducting the follow-up review consisted of: [(1) examination of the [PROGRAM'S] actions during the period of heightened oversight;] (2) in-depth review of the [#] program indicators identified above OR program] for the period of [REVIEW PERIOD]; [(3) field accompaniments of {#} Division inspectors;] (4) discussion of the status of the [PROGRAM]'s actions to address the [#] recommendations in the [YEAR] report; and (5) interviews with staff and management to answer questions or clarify issues. The team evaluated the information that it gathered against the IMPEP performance criteria for the three common performance indicators, and one non-common performance indicator, for activities conducted during the period of [REVIEW PERIOD]. Preliminary results were discussed with [STATE] management on [DATE].

Section 2 below discusses the results of the follow-up review of the [STATE] program for the [#] common performance indicator[S]. [Section 3 below discusses the results of the follow-up review of the {STATE} program for the[#] non-common performance indicator{S}.] Section 4 summarizes the review

team's findings and recommendations resulting from the follow-up review. [The {PROGRAM'S} progress in addressing other recommendations from the [YEAR] review and general status of the program covered in a periodic meeting can be found in Appendix D.]

2.0 COMMON PERFORMANCE INDICATORS

The follow-up review addressed [#] of the five common performance indicators used in reviewing both NRC Regional and Agreement State programs. The [#] indicators are: [LIST APPLICABLE INDICATORS].

2.1 Status of Materials Inspection Program

During the follow-up review, the review team evaluated actions taken by the [PROGRAM] in response to the finding of [FINDING] made during the [YEAR] IMPEP review, as well as the status of the inspections performed since the [YEAR] review, and the current status of due and overdue inspections.

The team reviewed the timeliness of inspections performed since the last review period, the current and projected backlog of overdue inspections, and timeliness in communication of inspection results to licensees. The team reviewed data provided by the [PROGRAM] from their inspection tracking system to determine the timeliness of inspections, and reviewed inspection files to determine the date of the issuance of inspection results to licensees relative to the date of inspection.

The review team's evaluation of the [PROGRAM'S] response to the [#] recommendation[S] is presented below.

Recommendation [#]

[RECOMMENDATION FROM THE PREVIOUS REPORT]

Current Status

[GIVE A FULL EXPLANATION OF THE REVIEW COMPLETED AND THE TEAM'S FINDINGS INCLUDING THE IMPROVEMENTS OF THE PROGRAM, AND WHETHER THE RECOMMENDATION SHOULD BE CLOSED. NEW RECOMMENDATIONS MAY BE MADE AS WELL. LIST EACH RECOMMENDATION.]

Based on the follow-up review, the team considers [DESCRIBE WHETHER THE TEAM BELIEVES THAT THE RECOMMENDATION(S) CAN BE CLOSED OR SHOULD REMAIN OPEN AND WHY]

The review team concludes that the materials inspection program has [DESCRIBE THE PROGRAM'S PERFORMANCE/IMPROVEMENTS/LACK OF IMPROVEMENT FOR THIS INDICATOR]. Based on the IMPEP evaluation criteria, the review team recommends that [STATE]'s performance with respect to the indicator, Status of Materials Inspection Program, [CONTINUES TO BE FOUND {RATING} OR SHOULD BE CHANGED FROM {OLD RATING} TO {NEW RATING}].

2.2 Technical Quality of Inspections

During the follow-up review, the review team evaluated actions taken by the [PROGRAM] in response to the finding of [RATING] made during the [YEAR] IMPEP review, as well as the status of the technical quality of inspections performed since the [YEAR] review.

The team evaluated inspection reports, enforcement documentation, and inspection field notes, interviewed inspectors for [#] inspections conducted during the review period, and conducted [#] inspector accompaniments. The casework included [#] of the [PROGRAM'S] materials license inspectors, and covered inspections of various types of licensees including [LIST TYPES]. Appendix E lists the inspection casework files reviewed for completeness and adequacy and accompaniments including case-specific comments.

The review team's evaluation of the [PROGRAM'S] response to the [#] recommendation[S] is presented below.

Recommendation [#]

[RECOMMENDATION FROM THE PREVIOUS REPORT]

Current Status

[GIVE A FULL EXPLANATION OF THE REVIEW COMPLETED AND THE TEAM'S FINDINGS INCLUDING THE IMPROVEMENTS OF THE PROGRAM, AND WHETHER THE RECOMMENDATION SHOULD BE CLOSED. NEW RECOMMENDATIONS MAY BE MADE AS WELL. LIST EACH RECOMMENDATION.]

Based on the follow-up review, the team considers [DESCRIBE WHETHER THE TEAM BELIEVES THAT THE RECOMMENDATION(S) CAN BE CLOSED OR SHOULD REMAIN OPEN AND WHY]

The review team concludes that the technical quality of the inspection program has [DESCRIBE THE PROGRAM'S PERFORMANCE/IMPROVEMENTS/LACK OF IMPROVEMENT FOR THIS INDICATOR]. Based on the IMPEP evaluation criteria, the review team recommends that [STATE]'s performance with respect to the indicator, Technical Quality of Inspections, [CONTINUES TO BE FOUND {RATING} OR SHOULD BE CHANGED FROM {OLD RATING} TO {NEW RATING}].

2.3 Technical Staffing and Training

During the follow-up review, the review team evaluated actions taken by the [PROGRAM] in response to the finding of [RATING] made during the [YEAR] IMPEP review, as well as the status of the status of the staffing and training of the [PROGRAM].

Issues central to the evaluation of this indicator include the Office's staffing level and staff turnover, as well as the technical qualifications and training histories of the staff. To evaluate these issues, the review team examined the Office's questionnaire responses relative to this indicator, interviewed Office management and staff, reviewed job descriptions and training records, and considered any possible workload backlogs.

The review team's evaluation of the [PROGRAM'S] response to the [#] recommendation[S] is presented below.

Recommendation [#]

[RECOMMENDATION FROM THE PREVIOUS REPORT]

Current Status

[GIVE A FULL EXPLANATION OF THE REVIEW COMPLETED AND THE TEAM'S FINDINGS INCLUDING THE IMPROVEMENTS OF THE PROGRAM, AND WHETHER THE RECOMMENDATION SHOULD BE CLOSED. NEW RECOMMENDATIONS MAY BE MADE AS WELL. LIST EACH RECOMMENDATION.]

Based on the follow-up review, the team considers [DESCRIBE WHETHER THE TEAM BELIEVES THAT THE RECOMMENDATION(S) CAN BE CLOSED OR SHOULD REMAIN OPEN AND WHY]

The review team concludes that the staffing and training program has [DESCRIBE THE PROGRAM'S PERFORMANCE/IMPROVEMENTS/LACK OF IMPROVEMENT FOR THIS INDICATOR]. Based on the IMPEP evaluation criteria, the review team recommends that [STATE]'s performance with respect to the indicator, Technical Staffing and Training, [CONTINUES TO BE FOUND {RATING} OR SHOULD BE CHANGED FROM {OLD RATING} TO {NEW RATING}].

2.4 Technical Quality of Licensing Actions

During the follow-up review, the team evaluated actions taken by the State in response to the recommendations for improvement noted during the [YEAR] review, as well as new licensing actions completed since that review. The team reviewed licensing actions, deficiency correspondence, and checklists for [#] licensing actions.

Licenses were reviewed for accuracy, appropriateness of the license and its conditions, tie-down conditions, and overall technical quality. Casework was evaluated for timeliness, adherence to good radiation safety practices, references to appropriate regulations, documentation of safety evaluation reports, product certifications or other supporting documents, pre-licensing visits, peer or supervisory review as indicated, and proper signature authority. The files were checked for retention of necessary documents and supporting data.

The [#] license files selected for review included work by all reviewers. The cross-section sampling included all of the State's major licenses as defined by the State, including the following types of licenses: [TYPES OF LICENSES]. Licensing actions during the review period included [#] new and [#] amendments (including terminations) totaling [#] licensing actions. A list of the licenses reviewed with case-specific comments can be found in Appendix F.

The review team's evaluation of the [PROGRAM'S] response to the [#] recommendation[S] is presented below.

Recommendation [#]

[RECOMMENDATION FROM THE PREVIOUS REPORT]

Current Status

[GIVE A FULL EXPLANATION OF THE REVIEW COMPLETED AND THE TEAM'S FINDINGS INCLUDING THE IMPROVEMENTS OF THE PROGRAM, AND WHETHER THE RECOMMENDATION SHOULD BE CLOSED. NEW RECOMMENDATIONS MAY BE MADE AS WELL. LIST EACH RECOMMENDATION.]

Based on the follow-up review, the team considers [DESCRIBE WHETHER THE TEAM BELIEVES THAT THE RECOMMENDATION(S) CAN BE CLOSED OR SHOULD REMAIN OPEN AND WHY]

The review team concludes that the technical quality of the licensing program has [DESCRIBE THE PROGRAM'S PERFORMANCE/IMPROVEMENTS/LACK OF IMPROVEMENT FOR THIS INDICATOR]. Based on the IMPEP evaluation criteria, the review team recommends that [STATE]'s performance with respect to the indicator, Technical Quality of Licensing Actions, [CONTINUES TO BE FOUND {RATING} OR SHOULD BE CHANGED FROM {OLD RATING} TO {NEW RATING}].

2.5 Response to Incidents and Allegations

During the follow-up review, the team evaluated actions taken by the [PROGRAM] in response to the finding of [RATING] made during the [YEAR] IMPEP review, as well as the status of the [PROGRAM'S] performance since the [YEAR] review.

The team reviewed [ANY SPECIFIC MATERIALS] and examined [#] investigations completed during the review period. A list of the incident casework examined with the case-specific comments is included in Appendix G. The team also reviewed the [PROGRAM'S] response to [#] allegations involving radioactive materials, including [#] allegations referred to the [PROGRAM] by the NRC during the review period.

The review team's evaluation of the [PROGRAM'S] response to the [#] recommendation[S] is presented below.

Recommendation [#]

[RECOMMENDATION FROM THE PREVIOUS REPORT] INDIVIDUALLY

Current Status

[GIVE A FULL EXPLANATION OF THE REVIEW COMPLETED AND THE TEAM'S FINDINGS INCLUDING THE IMPROVEMENTS OF THE PROGRAM, AND WHETHER THE RECOMMENDATION SHOULD BE CLOSED. NEW RECOMMENDATIONS MAY BE MADE AS WELL. LIST EACH RECOMMENDATION.]

Based on the follow-up review, the team considers [DESCRIBE WHETHER THE TEAM BELIEVES THAT THE RECOMMENDATION(S) CAN BE CLOSED OR SHOULD REMAIN OPEN AND WHY]

The review team concludes that the [PROGRAM'S] incident and allegation response program has [DESCRIBE THE PROGRAM'S PERFORMANCE/IMPROVEMENTS/LACK OF IMPROVEMENT FOR THIS INDICATOR]. Based on the IMPEP evaluation criteria, the review team recommends that [STATE]'s performance with respect to the indicator, Response to Incidents and Allegations, [CONTINUES TO BE FOUND {RATING} OR SHOULD BE CHANGED FROM {OLD RATING} TO {NEW RATING}].

3.0 NON-COMMON PERFORMANCE INDICATORS

The follow-up review addressed [#] of the non-common performance indicators used in reviewing NRC Regional and Agreement State programs. The [#] indicators are: [LIST APPLICABLE INDICATORS].

3.1 Legislation and Program Elements Required for Compatibility

3.1.1 Legislation

The review team noted that no legislation affecting the radiation control program was passed since the previous review in which the State legislation was found adequate. Legislative authority to create an agency and enter into an agreement with the NRC is granted in [DETAILS]. The [PROGRAM] is designated as the State's radiation control agency.

3.1.2 Program Elements Required for Compatibility

The [STATE] radiation control program's regulations are found in [REGULATIONS], and apply to all ionizing radiation from agreement materials, machine produced radiation, and naturally-occurring and accelerator-produced materials. [STATE] requires a license for possession, and use, of all radioactive material including naturally occurring materials, such as radium, and accelerator-produced radionuclides.

The review team's evaluation of the [PROGRAM'S] response to the [#] recommendation[S] is presented below.

Recommendation [#]

[RECOMMENDATION FROM THE PREVIOUS REPORT] INDIVIDUALLY

Current Status

[GIVE A FULL EXPLANATION OF THE REVIEW COMPLETED AND THE TEAM'S FINDINGS INCLUDING THE IMPROVEMENTS OF THE PROGRAM, AND WHETHER THE RECOMMENDATION SHOULD BE CLOSED. NEW RECOMMENDATIONS MAY BE MADE AS WELL. LIST EACH RECOMMENDATION.]

Based on the follow-up review, the team considers [DESCRIBE WHETHER THE TEAM BELIEVES THAT THE RECOMMENDATION(S) CAN BE CLOSED OR SHOULD REMAIN OPEN AND WHY]

The review team concludes that the [PROGRAM'S] regulation adoption program has [DESCRIBE THE PROGRAM'S PERFORMANCE/IMPROVEMENTS/LACK OF IMPROVEMENT FOR THIS INDICATOR]. Based on the IMPEP evaluation criteria, the review team recommends that [STATE]'s performance with respect to the indicator, Legislation and Program Elements Required for Compatibility, [CONTINUES TO BE FOUND {RATING} OR SHOULD BE CHANGED FROM {OLD RATING} TO {NEW RATING}].

3.2 Sealed Source and Device Evaluation Program

In conducting this review, three sub-indicators were used to evaluate the Program's performance regarding their SS&D Evaluation Program. These sub-indicators include:

- (1) Technical Quality of the Product Evaluation; (2) Technical Staffing and Training; and
- (3) Evaluation of Defects and Incidents Regarding SS&Ds.

[In assessing the SS&D Evaluation Program, the review team examined the information provided in the supplement to questions 31 through 33 of the 1999 IMPEP questionnaire response from {STATE}.] The team also evaluated actions taken by the State in response to the recommendations noted during the [YEAR] review, as well as new SS&D evaluations completed since that review, deficiency letters, and supporting documents.

3.1 Technical Quality of the Product Evaluation Program

The team reviewed a total of [#] certificates in the follow-up review which included: [LIST OF CERTIFICATE TYPES REVIEWED]. The review of the six certificates from the [YEAR] IMPEP report was limited to the [PROGRAM'S] actions in addressing previously identified comments. The SS&D registration certificates evaluated by the review team are listed with case-specific comments in Appendix H.

The review team's evaluation of the [PROGRAM'S] response to the [#] recommendation[S] is presented below.

Recommendation [#]

[RECOMMENDATION FROM THE PREVIOUS REPORT] INDIVIDUALLY

Current Status

[GIVE A FULL EXPLANATION OF THE REVIEW COMPLETED AND THE TEAM'S FINDINGS INCLUDING THE IMPROVEMENTS OF THE PROGRAM, AND WHETHER THE RECOMMENDATION SHOULD BE CLOSED. NEW RECOMMENDATIONS MAY BE MADE AS WELL. LIST EACH RECOMMENDATION.]

Based on the follow-up review, the team considers [DESCRIBE WHETHER THE TEAM BELIEVES THAT THE RECOMMENDATION(S) CAN BE CLOSED OR SHOULD REMAIN OPEN AND WHY]

3.2 Technical Staffing and Training

The review team's evaluation of the [PROGRAM'S] response to the [#] recommendation[S] is presented below.

Recommendation [#]

[RECOMMENDATION FROM THE PREVIOUS REPORT] INDIVIDUALLY

Current Status

[GIVE A FULL EXPLANATION OF THE REVIEW COMPLETED AND THE TEAM'S FINDINGS INCLUDING THE IMPROVEMENTS OF THE PROGRAM, AND WHETHER THE RECOMMENDATION SHOULD BE CLOSED. NEW RECOMMENDATIONS MAY BE MADE AS WELL. LIST EACH RECOMMENDATION.]

Based on the follow-up review, the team considers [DESCRIBE WHETHER THE TEAM BELIEVES THAT THE RECOMMENDATION(S) CAN BE CLOSED OR SHOULD REMAIN OPEN AND WHY]

3.3 Evaluation of Defects and Incidents Regarding SS&Ds

The review team's evaluation of the [PROGRAM'S] response to the [#] recommendation[S] is presented below.

Recommendation [#]

[RECOMMENDATION FROM THE PREVIOUS REPORT] INDIVIDUALLY

Current Status

[GIVE A FULL EXPLANATION OF THE REVIEW COMPLETED AND THE TEAM'S FINDINGS INCLUDING THE IMPROVEMENTS OF THE PROGRAM, AND WHETHER THE RECOMMENDATION SHOULD BE CLOSED. NEW RECOMMENDATIONS MAY BE MADE AS WELL. LIST EACH RECOMMENDATION.]

Based on the follow-up review, the team considers [DESCRIBE WHETHER THE TEAM BELIEVES THAT THE RECOMMENDATION(S) CAN BE CLOSED OR SHOULD REMAIN OPEN AND WHY]

The review team concludes that the [PROGRAM'S] SS&D evaluation program has [DESCRIBE THE PROGRAM'S PERFORMANCE/IMPROVEMENTS/LACK OF IMPROVEMENT FOR THIS INDICATOR]. Based on the IMPEP evaluation criteria, the review team recommends that [STATE]'s performance with respect to the indicator, Sealed Source and Device Evaluation Program, [CONTINUES TO BE FOUND {RATING} OR SHOULD BE CHANGED FROM {OLD RATING} TO {NEW RATING}].

4.0 SUMMARY

The follow-up review team evaluated [STATE]'s performance in responding to [DETAILS OF INDICATOR RATINGS] and resolving the specific recommendations made during the [YEAR] IMPEP review [FOR THE {#} COMMON AND {#} NON-COMMON PERFORMANCE INDICATORS, {LIST INDICATORS}]. The follow-up review team concludes that [CONCLUSIONS OF REVIEW TEAM]. Based on this information, the review team recommendeds that the [STATE] program be found [ADEQUACY AND COMPATIBILITY RATINGS].

[DETAIL THE TEAM'S RECOMMENDATIONS AS TO WHAT STEPS SHOULD BE NEXT]

Below is a summary list of the open recommendation[S] from the [#] report [and the new recommendations from this follow-up review].

Recommendations from the [YEAR] report:

[LIST RECOMMENDATIONS INDIVIDUALLY]

[Recommendations from this review:]

[LIST RECOMMENDATIONS INDIVIDUALLY]

LIST OF APPENDICES

Appendix A	IMPEP Follow-up Review Team Members
Appendix B	[PROGRAM] Organizational Chart
[Appendix C	Heightened Oversight Program Correspondence]
[Appendix D	Periodic Meeting Summary Including Status of Other Recommendations from the Previous Review]
[Appendix E	Inspection Casework Reviews and Accompaniments]
[Appendix F	Licensing Casework Reviews]
[Appendix G	Incident Casework Reviews]
[Appendix H	Sealed Source and Device Evaluation Casework Reviews]

[NOTE: FOR CURRENT FORMAT FOR CASEWORK APPENDICES, PLEASE SEE STP
PROCEDURE SA-100]

APPENDIX A

IMPEP REVIEW TEAM MEMBERS

Name	Area of Responsibility
[TEAM LEADER, PROGRAM]	Team Leader [INDICATOR{S}]
[TEAM MEMBER, PROGRAM]	[INDICATOR{S}]
[TEAM MEMBER, PROGRAM]	[INDICATOR{S}]

APPENDIX B

[STATE] ORGANIZATIONAL CHART

(ML[#])

APPENDIX C

HEIGHTENED OVERSIGHT PROGRAM CORRESPONDENCE

Minutes of Bimonthly Conference Calls:

1. [DATE] conference call minutes.
2. [DATE] conference call minutes.
3. [DATE] conference call minutes.
4. [DATE] conference call minutes.

Letters from/to [STATE]:

[LIST EACH CORRESPONDENCE WITH THE STATE SINCE THE PREVIOUS IMPEP REVIEW INDIVIDUALLY. ATTACH MINUTES FROM EACH CALL.

APPENDIX D

PERIODIC MEETING SUMMARY INCLUDING STATUS OF OTHER RECOMMENDATIONS FROM THE PREVIOUS REVIEW

A periodic meeting was held with [PROGRAM] management by [TEAM LEADER], Team Leader, and [RSAO], Regional State Agreements Officer, during the follow-up review pursuant to STP Procedure SA-116, "Periodic Meeting with Agreement States Between IMPEP Reviews." Those topics normally documented during the periodic meeting that were reviewed and documented as part of the follow-up review will not be discussed in this Appendix. The following topics were discussed.

Action on Previous Review Findings

The [MONTH AND YEAR] IMPEP report made [#] recommendations for action by the [PROGRAM]. [#] of these recommendations were discussed in earlier sections under their respective indicators. The status of the remaining [#] comments is discussed below.

Recommendation [#]

[RECOMMENDATION]

Current Status

[BRIEF OVERVIEW OF WHAT THE PROGRAM HAS DONE]

Recommendation [#]

[RECOMMENDATION]

Current Status

[BRIEF OVERVIEW OF WHAT THE PROGRAM HAS DONE]

Program Strengths and/or Weaknesses

Feedback on NRC's Program

Status of Program and/or Policy Changes

Impact of NRC Program Changes

Internal Program Audits and Self-Assessments

Status of Allegations Previously Referred

Nuclear Material Events Database (NMED) Reporting

APPENDIX C

Sample Letter for Final Report

[NAME]
[TITLE, STATE SENIOR MANAGEMENT]
[ADDRESS]

Dear [NAME]:

On [DATE], the Management Review Board (MRB) met to consider the proposed final Integrated Materials Performance Evaluation Program (IMPEP) report on the [STATE] Agreement State Program. The MRB found the [STATE] program [ADEQUATE TO ASSURE PUBLIC HEALTH AND SAFETY/ADEQUATE, BUT NEED IMPROVEMENT] and [COMPATIBLE/NOT COMPATIBLE] with NRC's program.

[OR]

Enclosed is the final report of the follow-up Integrated Materials Performance Evaluation Program (IMPEP) review of the [STATE] program. The review was conducted by an interoffice team on [DATE]. The team reviewed, in detail, the performance indicators of concern identified during the [YEAR] IMPEP review, [LIST APPROPRIATE PERFORMANCE INDICATORS]. [TEAM LEADER] was the team leader for the follow-up review. The review team recommended, and the Management Review Board (MRB) agreed, that the [STATE] program be found [ADEQUATE TO ASSURE PUBLIC HEALTH AND SAFETY/ADEQUATE, BUT NEED IMPROVEMENT] and [COMPATIBLE/NOT COMPATIBLE] with NRC's program.

Section 5.0, page [PAGE NUMBER], of the enclosed final report presents the IMPEP team's recommendations. [WE RECEIVED YOUR [DATE] LETTER WHICH DESCRIBED THE ACTIONS TAKEN IN RESPONSE TO THE TEAM'S RECOMMENDATIONS. WE REQUEST NO ADDITIONAL INFORMATION.] or [WE REQUEST YOUR EVALUATION AND RESPONSE TO THOSE RECOMMENDATIONS WITHIN 30 DAYS FROM RECEIPT OF THIS LETTER.]

Based on the results of the current IMPEP review, the next full review will be in approximately [#] years.

I appreciate the courtesy and cooperation extended to the IMPEP team during the review and your support of the Radiation Control Program. I look forward to our agencies continuing to work cooperatively in the future.

Sincerely,

[NAME]
Deputy Executive Director

for Materials, Research, and State Programs

Enclosure:
As stated

cc: [NAME, RCP, STATE]
[SLO]

bcc: [CHAIRMAN]
[NRC COMMISSIONERS]

Distribution:

DIR RF

IMPEP Project Manager, STP PDR (YES√)

Senior Program Analyst, NMSS

[IMPEP TEAM MEMBERS]

Director, IMNS

RSAO

RSLO

OGC

ASPO

[STATE] File

DCD (SP01)

DOCUMENT NAME: G:\IMPEP\20## ST Final IMPEP Report and Letter.WPD

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OFFICE	[OFFICE]		STP:DD		STP:D		DEDMRS			
NAME	Team Leader									
DATE										

APPENDIX D

Sample Acknowledgment Letter

[NAME]
[TITLE, STATE SENIOR MANAGEMENT]
[ADDRESS]

Dear [NAME]:

Thank you for your letter dated [DATE], responding to our request for an evaluation and response to the recommendations of the final Integrated Materials Performance Evaluation Program (IMPEP) review report for the [STATE] Agreement State Program. We find your responses adequate and will conduct the next IMPEP review in [FY].

We appreciate the positive actions that you and your staff have taken and are continuing to implement with regard to our comments. I look forward to our agencies continuing to work cooperatively in the future.

Sincerely,

[NAME]
Deputy Executive Director
for Materials, Research, and State Programs

Enclosure:
As stated

cc: [NAME, RCP, STATE]
[SLO]

Distribution:

DIR RF

DCD (SP01)

PDR (YES \sqrt)

IMPEP Project Manager, STP

Senior Program Analyst, NMSS

[IMPEP TEAM MEMBERS]

RSLO ASPO

RSAO

Director, IMNS

OGC

[STATE] File

DOCUMENT NAME: G:\IMPEP\YYYYACKXX.WPD

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OFFICE	[OFFICE]		STP:DD		STP:D				
NAME	Team Leader								
DATE									

Appendix E

Frequently Asked Questions

Q: If I'm on the review team for a program that is to receive a follow-up review, will I automatically be on the follow-up review team?

A: Not automatically. We try to have as many of the original team members as practical come back to participate on the follow-up review, however it is not a necessity and there are many important factors. The scope of the follow-up review is very important. Only the principle reviewers of the indicators receiving a full review need participate in the follow-up review. Also, in some circumstances, it may be desirable to have a new team member on the follow-up review team to give a different perspective.

Q: Will a follow-up review always follow a period of Heightened Oversight?

A: Generally, a follow-up review will follow a period of Heightened Oversight, although the findings of the follow-up 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 follow-up review is scheduled, team member should retain their materials until the follow-up review report has been issued.

Q: What recommendations can be closed out during a follow-up review?

A: Recommendations can only be closed out if they are fully evaluated during a review. Thus, all recommendations can be closed out during a full follow-up IMPEP review, but the recommendations discussed during the periodic meeting-like portion of a limited scope follow-up review cannot be closed out until the next full IMPEP review.