



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

April 15, 2020

MEMORANDUM TO: Chairman Svinicki  
Commissioner Baran  
Commissioner Caputo  
Commissioner Wright

FROM: John W. Lubinski, Director  
Office of Nuclear Material Safety  
and Safeguards

SUBJECT: ANNUAL REPORT ON AGREEMENT STATES' AND U.S. NUCLEAR  
REGULATORY COMMISSION'S RADIOACTIVE MATERIALS  
PROGRAMS FOR CALENDAR YEAR 2019

Enclosed is the annual report to inform the Commission of the status of the Agreement States' and U.S. Nuclear Regulatory Commission's radioactive materials programs. Staff is providing this report in accordance with the June 30, 1997, Staff Requirements Memorandum on SECY-97-054, "Final Recommendations on Policy Statement and Implementing Procedures for: 'Statement of Principles and Policy for the Agreement State Program' and 'Policy Statement on Adequacy and Compatibility of Agreement State Programs.'"

Enclosure:  
Annual Report on Agreement States' and  
U.S. Nuclear Regulatory Commission's  
Radioactive Materials Programs for  
Calendar Year 2019

cc: SECY  
OGC  
OCA  
OPA  
CFO  
EDO

CONTACT: Robert K. Johnson, NMSS/MSST  
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SUBJECT: ANNUAL REPORT ON AGREEENT STATES' AND U.S. NUCLEAR  
REGULATORY COMMISSION'S RADIOACTIVE MATERIALS PROGRAMS  
FOR CALENDAR DATED APRIL 15, 2020

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**ANNUAL REPORT ON AGREEMENT STATES' AND U.S. NUCLEAR REGULATORY  
COMMISSION'S RADIOACTIVE MATERIALS PROGRAMS FOR CALENDAR YEAR 2019**

## **EXECUTIVE SUMMARY**

This report summarizes the performance of the Agreement State and U.S. Nuclear Regulatory Commission (NRC) radioactive materials programs including: (1) the ability to provide reasonable assurance of adequate protection of public health and safety, and (2) the compatibility of Agreement State programs with the NRC's regulatory program. The NRC verifies the performance of these programs through the Integrated Materials Performance Evaluation Program (IMPEP).

Agreement State and NRC programs are determined to be adequate to protect public health and safety if the administration of these programs provides reasonable assurance of the protection of public health and safety in regulating the use of radioactive material. Overall, the Agreement State and NRC programs continue to provide reasonable assurance of adequate protection of public health and safety. Agreement State and NRC program performance, as measured by the IMPEP, has been consistently strong. During calendar year (CY) 2019, 35 of the 39 Agreement State programs had an adequacy finding of adequate to protect public health and safety. The remaining four States: Florida, Kansas, Mississippi, and Rhode Island, had adequacy findings of adequate to protect public health and safety, but needs improvement. Regarding compatibility, 36 of the 39 Agreement State programs had a compatibility finding of compatible with the NRC's regulatory program. The remaining three States: Florida, Kentucky, and New York, had compatibility findings of not compatible with the NRC's regulatory program. All programs that have IMPEP findings are taking actions to address the issues, which will be reviewed through the IMPEP processes. All NRC programs have been determined to be adequate to protect public health and safety.

The NRC staff's analysis of the CY 2019 IMPEP results indicates that the National Materials Program is performing positively and is protective of public health and safety. Agreement States continue to play a valuable role in the IMPEP, as evidenced by establishing the National Materials Co-champions and an increase of Agreement State participation in program activities. The NRC staff will continue to monitor performance through the IMPEP and work with the Agreement State and NRC programs to address any performance issues or trends.

## **BACKGROUND**

Section 274 of the Atomic Energy Act of 1954, as amended (AEA), provides broad authority for the U.S. Nuclear Regulatory Commission (NRC) to establish a unique Federal and State relationship in the administration of regulatory programs to provide reasonable assurance of adequate protection of public health and safety in the industrial, medical, commercial, and research uses of agreement material (source, byproduct, and small quantities of special nuclear material as identified by Section 274b. of the Atomic Energy Act, as amended). Subsection 274b. of the AEA authorizes the NRC to enter into an agreement by which the NRC discontinues and the State assumes regulatory authority over some or all of these materials. In order to discontinue its authority, the NRC must find that the State program is adequate to protect public health and safety and compatible with the NRC program for the regulation of agreement material. The NRC also has an obligation, pursuant to Subsection 274j. of the AEA, to periodically review existing Agreement State programs to ensure continued adequacy and compatibility.

## **PERFORMANCE MONITORING**

The NRC uses the Integrated Materials Performance Evaluation Program (IMPEP) to periodically review the Agreement State and NRC programs to verify that these programs are adequate to protect public health and safety, and to verify that Agreement State programs are compatible with the areas of the NRC's regulatory program that require compatibility.

Agreement State and NRC programs are determined to be adequate to protect public health and safety if the administration of these programs provides reasonable assurance of the protection of public health and safety in regulating the use of radioactive material. Adequacy findings under IMPEP result in one of three conclusions: (1) adequate to protect public health and safety; (2) adequate to protect public health and safety, but needs improvement; or (3) not adequate to protect public health and safety.

The frequency of IMPEP reviews range from 1 to 5 years, based on the program's performance. All reviews are conducted in accordance with NRC Management Directive 5.6, "Integrated Materials Performance Evaluation Program (IMPEP)," and are conducted by teams of NRC and Agreement State staff members. The NRC staff also conducts periodic meetings between the IMPEP reviews to remain knowledgeable of the status of Agreement State and NRC Programs. A Management Review Board (MRB), composed of senior NRC managers and an Organization of Agreement States Liaison, convenes to deliberate the adequacy and compatibility findings and the frequency and type of the next IMPEP review. The NRC finalized revisions to MD 5.6 and one of those changes resulted in the MRB Chair making the final NRC determination, based on input from the review team, MRB members, and the Agreement State being reviewed.

In addition to the changes above, in January 2020, the MRB Chair made the determination that the NRC materials programs will be evaluated as a single entity under IMPEP, beginning in Fiscal Year (FY) 2021 (Agencywide Documents Access Management System (ADAMS) Accession No. ML19331A856). This change stems from a recommendation from the staff's June 2018 IMPEP self-assessment report entitled "Focused Self-Assessment of the Integrated Materials Performance Evaluation Program (IMPEP)" (ADAMS Accession No. ML17187A100). Currently, IMPEP assess NRC's regional materials programs and the Sealed Source & Device Evaluation program as separate entities. Evaluating the NRC materials program as a single entity under IMPEP would be consistent with the IMPEP reviews of Agreement States with multiple agencies.

When the NRC promulgates regulations, it determines the degree to which Agreement States must be compatible with the NRC's regulations. Agreement State programs are determined to be compatible with the NRC's regulatory program when Agreement State programs align with this determination, and therefore do not create conflicts, duplications, gaps, or other conditions that jeopardize an orderly pattern in the regulation of agreement material. The IMPEP review compatibility findings for Agreement State programs are either compatible or not compatible.

The NRC takes a graded approach to address programmatic weaknesses in Agreement State programs. Program improvement measures may include: monitoring, heightened oversight, probation, or suspension. Under these processes, the NRC staff works collaboratively with the Agreement States to ensure that they have a full understanding of the issues that need to be addressed, and that appropriate corrective actions are implemented in order to progress toward re-establishing fully satisfactory program performance.

During CY 2019, the NRC and its Agreement State partners conducted 11 IMPEP reviews with the support of 18 Agreement State personnel. Twelve Agreement State personnel also served as representatives to MRB and Special MRB meetings.

### **AGREEMENT STATE PROGRAM PERFORMANCE**

This section discusses the status of materials programs on heightened oversight or monitoring, and programs that were either adequate, but needs improvement or not compatible during CY 2019. A brief summary of recent activities related to materials programs on heightened oversight or monitoring is presented in Attachment 1, "Heightened Oversight and Monitoring Status Chart." It should be noted that the NRC is monitoring the progression of the COVID-19 public health emergency and its impact to the National Materials Program. To this end, NRC conducted the Wyoming IMPEP review remotely and may adjust the IMPEP review schedule for the remaining IMPEPs on a case by case basis for the remaining reviews in CY2020, as appropriate.

### **Agreement State Programs on Heightened Oversight or Monitoring During CY 2019**

During CY 2019, the Kansas, Rhode Island, Arkansas, and Georgia Agreement State programs were on heightened oversight or monitoring. During CY 2019, the Arkansas and Georgia Agreement State programs were removed from monitoring. The Kansas Agreement State Program was removed from heightened oversight and placed on monitoring, following the August 2019 periodic meeting.

The Kansas Agreement State program was placed on heightened oversight following its June 2018 IMPEP. The Kansas program was found to be adequate to protect public health and safety, but needs improvement, and compatible with the NRC's regulatory program. The Kansas program was found satisfactory, but needs improvement for the performance indicators technical quality of inspections, technical quality of licensing actions, and compatibility requirements; and, unsatisfactory for the performance indicator technical quality of incidents and allegations. The NRC staff received and approved Kansas' Program Improvement Plan and began holding periodic calls in January 2019. Based on the results of the August 2019 periodic meeting and subsequent MRB, the NRC identified significant progress in addressing the 2018 IMPEP findings and placed this Program on a period of monitoring, thereby terminating the period of heightened oversight. The next full IMPEP review will be in May 2020.

The Rhode Island Agreement State program was placed on monitoring after the October 2011 IMPEP review, and remained on monitoring after the March 2016 IMPEP review. Based on the results of the October 2018 periodic meeting and subsequent MRB, the NRC determined that while the program continues to make progress in addressing weaknesses, it had not demonstrated a period of sustained performance, and therefore should remain on monitoring. During CY 2019, the NRC continued conducting quarterly calls to monitor program performance. The next full IMPEP review will be in July 2020.

The Arkansas program was placed on monitoring following its November 2017 IMPEP review. Based on the results of the May 2019 follow-up IMPEP review and subsequent MRB, the NRC found that the Arkansas program was adequate to protect public health and safety, and compatible with the NRC's regulatory program, and therefore the period of monitoring was discontinued based on program improvements. The next full IMPEP review will be in 2021.

The Georgia Agreement State program was placed on probation after the October 2012 IMPEP review and then heightened oversight after the January 2014 IMPEP review. As a result of the 2016 IMPEP review, the Georgia program was found adequate to protect public health and safety, and compatible with the NRC's regulatory program. At that time, the MRB acknowledged the performance improvements in the Georgia program since 2012. At the periodic meeting held in December 2018, NRC staff noted that the Georgia program continues to make improvements to ensure compliance with IMPEP requirements, and has demonstrated a sustained period of satisfactory performance. Based on the results of the February 2019 periodic meeting, the NRC removed the program from a period of monitoring. The next full IMPEP review will be in April 2020.

#### **Agreement State Programs that were either Adequate, But Needs Improvement or Not Compatible during CY 2019**

During CY 2019, the Florida, Kentucky, Mississippi, and New York Agreement State programs had overall program findings of either "adequate to protect public health and safety, but needs improvement" or "not compatible" with the NRC's regulatory program.

The Florida Agreement State program was found to be adequate to protect public health and safety, but needs improvement, and not compatible with the NRC's regulatory program following its June 2019 IMPEP review. The team determined that the declining performance was mainly due to institutional knowledge leaving the program and training issues. Although, Florida hired staff in a timely manner, the lack of knowledge transfer affected the areas of inspections, reporting of incidents to the Nuclear Material Events Database, and the promulgation to regulations required for compatibility. A Periodic Meeting will be held in June 2020.

While there were no IMPEP related activities for the Mississippi Agreement State program during CY 2019, the program remained adequate to protect public health and safety, but needs improvement, for reporting purposes. Following the April 2017 IMPEP review, the Mississippi Agreement State program was found adequate to protect public health and safety, but needs improvement and compatible with the NRC's regulatory program, and placed on monitoring. As a result of the April 2018 periodic meeting, the period of monitoring was discontinued based on program improvements, including enhancements to staff retention, technical quality of licensing actions, response to incidents and allegations, and the adoption of NRC regulations by reference. The next full IMPEP review will be in 2021.

The Kentucky Agreement State program was found to be adequate to protect public health and safety but not compatible with the NRC's regulatory program following its July 2016 IMPEP review. This was the result of Kentucky's not adopting regulations, or other legally binding requirements, in a timely manner. The NRC staff had a periodic meeting with the staff and management from the Kentucky program in September 2018. At the time of the periodic meeting 16 NRC regulations were overdue for adoption; however, Kentucky recently incorporated a number of NRC regulations by reference and has made significant progress in addressing compatibility issues. Kentucky's most recent IMPEP was conducted in January 2020, and the MRB meeting is scheduled to be conducted in April 2020.

The New York Agreement State program was first placed on heightened oversight following the November 2006 IMPEP review and moved to a period of monitoring following its March 2014 IMPEP review. Based on the results of the March 2018 IMPEP review, the NRC found that the New York program was adequate to protect public health and safety, but not compatible with the NRC's regulatory program, and that the period of monitoring was discontinued. This decision was based on the New York program's progress in making performance improvements in the areas of staffing and training and compatibility. The next full IMPEP review will be in 2022.

### **STATUS OF THE NATIONAL MATERIALS PROGRAM**

The performance of the NMP can be assessed through a review of IMPEP findings in the following areas: (1) performance indicator results, and (2) adequacy and compatibility status.

#### **Performance Indicator Results**

In CY 2019, the NRC and its Agreement State partners conducted ten full IMPEP reviews and one follow-up IMPEP review, evaluating a total of 66 performance indicators. During CY 2019, 62 of the performance indicators reviewed were found to be fully satisfactory; 3 performance indicators were found to be satisfactory, but needs improvement; and 1 performance indicator was found to be unsatisfactory.

During the last 5 years, the NRC and its Agreement State partners have conducted more than 37 IMPEP reviews, evaluating a total of 268 performance indicators. Based on the last IMPEP review results for each of the Agreement States and NRC programs that constitute the NMP, 241 performance indicators evaluated were found to be fully satisfactory, 22 performance indicators were found to be satisfactory, but needs improvement, and only 5 of the performance indicators were found to be unsatisfactory.

Attachment 2 provides the most recent IMPEP findings for each NRC and Agreement State programs as well as their adequacy and compatibility results. As shown in this attachment, the most challenged performance indicator is the non-common performance indicator *Legislation, Regulations, and Other Program Elements*. This performance indicator only applies to Agreement States as it assesses whether Agreement State programs create conflicts, duplications, gaps, or other conditions that jeopardize an orderly pattern in the regulation of radioactive materials under the Atomic Energy Act, as amended.

#### **Adequacy and Compatibility Status in the National Materials Program**



Currently, 91 percent of the programs (35 Agreement State programs and the 4 NRC programs<sup>1</sup>) are adequate to protect public health and safety. With regards to compatibility, 92 percent (36 Agreement State programs) were compatible with the NRC's regulatory program. Table 1 provides the adequacy and compatibility results for the Agreement States and NRC programs for the last 6 years. There were no programs found not adequate to protect public health and safety during this time period. While the number of Agreement States has increased in this time period, IMPEP results continue to provide evidence that the NMP provides for reasonable assurance of adequate protection of public health and safety.

<b>Table 1. Adequacy and Compatibility Results CY 2014 – CY 2019</b>						
	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
<b>Adequate to Protect Public Health and Safety</b>	35	36	38	36	38	39
<b>Adequate to Protect Public Health and Safety, But Needs Improvement</b>	6	5	3	5	4	4
<b>Compatible with the NRC's Regulatory Program</b>	33	33	33	34	36	36
<b>Not Compatible</b>	4	4	4	3	2	3

## **CONCLUSION**

Agreement State and NRC programs continue to provide for reasonable assurance of adequate protection of public health and safety. The IMPEP remains an important tool to ensure that the NRC and Agreement State radiation control programs are evaluated in an integrated manner, that public health and safety is being adequately maintained, and that Agreement State programs are compatible with the NRC's regulatory program. The Agreement States continue to play a valuable role with respect to ensuring consistent implementation of the NMP in protecting the public health and safety.

Attachment:

1. Heightened Oversight and Monitoring Status Chart
2. Summary of NRC and Agreement State Materials Programs' Adequacy and Compatibility

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<sup>1</sup> In January 2020, the NRC made the decision to evaluate the NRC materials programs as a single entity under the IMPEP, beginning in 2021.

**HEIGHTENED OVERSIGHT AND MONITORING STATUS CHART**

(As of April 2020)

STATE	LAST IMPEP REVIEW	LAST CONTACT	NEXT CONTACT	ACTION(S) DUE
<b>HEIGHTENED OVERSIGHT</b>				
None				
<b>MONITORING</b>				
Kansas	Jun. 25-29, 2018	Quarterly Call March 12, 2020	2020 IMPEP May 18-22, 2020	None
Rhode Island	Mar. 7-10, 2016	Quarterly Call Feb. 7, 2020	Quarterly Call May 2020	2020 IMPEP July 13-17, 2020

**NRC and Agreement State Radioactive Materials Programs' Findings for  
Performance Indicators and Adequacy and Compatibility  
(As of April 2020)**

AGREEMENT STATE/NRC MATERIALS PROGRAM	CALENDAR YEAR OF LAST FULL IMPEP REVIEW CONDUCTED	COMMON PERFORMANCE INDICATORS					NON-COMMON PERFORMANCE INDICATORS				OVERALL PROGRAM RATING		NEXT IMPEP REVIEW
		Technical Staffing and Training	Status of Material Inspection Program	Technical Quality of Inspections	Technical Quality of Licensing Actions	Technical Quality of Incident and Allegation Activities	Legislation, Regulations, and Other Program Elements	Sealed Source and Device Evaluation Program	Uranium Recovery Program	Low-Level Waste Disposal Program	ADEQUACY	COMPATIBILITY	
Alabama	CY 2019	SAT	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate <sup>2</sup>	Compatible <sup>3</sup>	2023
Arizona	CY 2020	SAT	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate	Compatible	2024
Arkansas	CY 2017	SAT	SAT	SAT	SBNI <sup>4,5</sup>	SAT	SAT	-	-	-	Adequate	Compatible	2021
California	CY 2019	SAT	SAT	SAT	SAT	SAT	SAT	SAT	-	-	Adequate	Compatible	2024
Colorado	CY 2018	SAT	SAT	SAT	SAT	SAT	SAT	SAT	SAT	-	Adequate	Compatible	2022
Florida	CY 2019	SAT	SAT	SBNI	SAT	SAT	UNSAT <sup>6</sup>	SAT	-	-	ABNI <sup>7</sup>	Not Compatible	2023
Georgia	CY 2016	SAT	SAT	SAT	SBNI	SAT	SAT	-	-	-	Adequate	Compatible	2020
Illinois	CY 2018	SAT	SAT	SAT	SAT	SAT	SAT	-	SAT	-	Adequate	Compatible	2023
Iowa	CY 2018	SAT	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate	Compatible	2022
Kansas	CY 2018	SAT	SAT	SBNI	SBNI	UNSAT	SBNI	-	-	-	ABNI	Compatible	2020
Kentucky	CY 2016	SAT	SAT	SAT	SAT	SAT	UNSAT	SAT	-	SAT	Adequate	Not compatible	2020
Louisiana	CY 2016	SAT	SAT	SAT	SAT	SBNI	SAT	SAT	-	-	Adequate	Compatible	2020
Maine	CY 2019	SAT	SAT	SAT	SAT	SAT	SBNI	SAT	-	-	Adequate	Compatible	2023
Maryland	CY 2015	SAT	SAT	SAT	SAT	SAT	SAT	SAT	-	-	Adequate	Compatible	2020
Massachusetts	CY 2018	SAT	SAT	SAT	SAT	SAT	SAT	SAT	-	-	Adequate	Compatible	2022
Minnesota	CY 2016	SAT	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate	Compatible	2022
Mississippi	CY 2017	SAT	SAT	SAT	SBNI	SBNI	SBNI	-	-	-	ABNI	Compatible	2021
Nebraska	CY 2016	SAT	SAT	SAT	SAT	SAT	SBNI	-	-	-	Adequate	Compatible	2020
Nevada	CY 2017	SAT	SAT	SAT	SAT	SAT	SAT	-	-	SAT	Adequate	Compatible	2021
New Hampshire	CY 2016	SAT	SAT	SAT	SAT	SAT	SAT	SAT	-	-	Adequate	Compatible	2021
New Jersey	CY 2019	SAT	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate	Compatible	2024
New Mexico	CY 2017	SAT	SAT	SAT	SAT	SAT	SBNI	-	-	-	Adequate	Compatible	2021
New York	CY 2018	SBNI	SAT	SAT	SAT	SAT	UNSAT	SAT	-	SAT	Adequate	Not compatible	2022
North Carolina	CY 2018	SAT	SAT	SAT	SAT	SAT	SAT	SBNI	-	-	Adequate	Compatible	2022

<sup>2</sup> Adequate to protect public health and safety.

<sup>3</sup> Compatible with NRC's regulatory program.

<sup>4</sup> Satisfactory, but needs improvement.

<sup>5</sup> Indicator Changed as a result of the CY 2019 Follow-Up IMPEP review.

<sup>6</sup> Unsatisfactory.

<sup>7</sup> Adequate to protect public health and safety, but needs improvement.

**NRC and Agreement State Radioactive Materials Programs' Findings for  
Performance Indicators and Adequacy and Compatibility  
(As of March 2020)**

Agreement State/NRC Materials Program	Calendar Year of Last Full IMPEP Review Conducted	COMMON PERFORMANCE INDICATORS					NON-COMMON PERFORMANCE INDICATORS				OVERALL PROGRAM RATING		NEXT IMPEP REVIEW
		Technical Staffing and Training	Status of Material Inspection Program	Technical Quality of Inspections	Technical Quality of Licensing Actions	Technical Quality of Incident and Allegation Activities	Legislation, Regulations, and Other Program Elements	Sealed Source and Device Evaluation Program	Uranium Recovery Program	Low-Level Waste Disposal Program	ADEQUACY	COMPATIBILITY	
North Dakota	CY 2019	SAT	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate	Compatible	2024
Ohio	CY 2019	SAT	SAT	SAT	SAT	SAT	SAT	SAT	-	-	Adequate	Compatible	2024
Oklahoma	CY 2018	SAT	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate	Compatible	2023
Oregon	CY 2017	SAT	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate	Compatible	2023
Pennsylvania	CY 2019	SAT	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate	Compatible	2024
Rhode Island	CY 2016	SBNI	UNSAT	SAT	SAT	SAT	SAT	-	-	-	ABNI	Compatible	2020
South Carolina	CY 2017	SAT	SAT	SAT	SAT	SAT	SAT	SAT	-	SAT	Adequate	Compatible	2021
Tennessee	CY 2016	SAT	SAT	SAT	SAT	SAT	SAT	SAT	-	-	Adequate	Compatible	2021
Texas	CY 2018	SAT	SAT	SAT	SBNI	SAT	SAT	SAT	SBNI	SAT	Adequate	Compatible	2021
Utah	CY 2019	SAT	SAT	SAT	SAT	SAT	SAT	-	SAT	SAT	Adequate	Compatible	2023
Vermont <sup>8</sup>	CY 2021	-	-	-	-	-	-	-	-	-	Adequate	Compatible	2019
Virginia	CY 2014	SBNI	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate	Compatible	2020
Washington	CY 2018	SAT	SAT	SAT	SBNI	SAT	SBNI	SAT	SAT	SAT	Adequate	Compatible	2022
Wisconsin	CY 2019	SAT	SAT	SAT	SAT	SAT	SAT	-	-	-	Adequate	Compatible	2024
Wyoming <sup>9</sup>	CY 2020	-	-	-	-	-	-	-	-	-	Adequate	Compatible	2020
NRC HQ-SSD	CY 2014	-	-	-	-	-	-	SAT	-	-	Adequate	NA	2021 <sup>10</sup>
Region I	CY 2015	SAT	SAT	SAT	SAT	SAT	-	-	-	-	Adequate	NA	2021
Region III	CY 2017	SAT	SAT	SAT	SAT	SAT	-	-	-	-	Adequate	NA	2021
Region IV	CY 2019	SAT	SAT	SAT	SAT	SAT	-	-	SAT	-	Adequate	NA	2021

<sup>8</sup> Vermont Agreement signed September 30, 2019, with the first IMPEP review scheduled in 2021.

<sup>9</sup> Wyoming Agreement signed September 25, 2018, with the first IMPEP review scheduled in 2020.

<sup>10</sup> NRC's next IMPEP review will consolidate all HQ and regional materials programs into a signal integrated review scheduled in CY 2021.