

January 17, 2007

SUMMARY OF COMMENTS ON IMPEP QUESTIONNAIRE

I. Sent to the Agreement States for Comment: August 31, 2006 (STP-06-079)

Comments/Dated: OAS Executive Board - 9/22/06 (e-mail - no comments)

II. Sent to the NRC Offices for Comment: August 31, 2006

Comments/Dated: Region I - 9/20/06 (e-mail)
Region III - 9/22/06 (email)
Region IV - 9/29/06 (e-mail)

REGION I

Comment 1:

In light of reorganization of STP and NMSS into the Office of Federal and State Materials and Environmental Management Programs, the offices and manager titles referenced in the procedure should reflect the new office and its divisions.

Response:

We agree with this comment and the procedure was revised accordingly.

Comment 2:

The procedure should indicate how the IMPEP Project Manager will control and maintain the qualification forms. A few questions come to mind: Will they be placed in ADAMS? Should a copy be provided to the Office or Regional Training Coordinator as they are updated?

Response:

At this time, we do not believe that this level of detail needs to be described in this procedure. No changes to the procedure were made as a result of this comment.

Comment 3:

The principal reviewer for the Technical Quality of Incident and Allegations should also be a qualified inspector. Regional and Agreement State response to incidents nearly always require the talents of a qualified inspector. Due to the complexity of some incidents and allegations, the IMPEP review of this indicator should be done by an individual qualified to perform the activity independently.

Response:

We appreciate the comment and understand the concern; however, limiting qualification for the indicator, Technical Quality of Incident and Allegation Activities, would in turn limit many individuals participation in IMPEP reviews. We believe that most routine incidents and allegations can be appropriately evaluated by individuals without inspector qualifications. There is always at least one qualified inspector on every review. In cases where an inspector's input is needed, the principal reviewer could seek the advice of the inspector-qualified team member.

Comment 4:

The professional experience for SS&D principal reviewer should be an individual who has been qualified by their agency to independently review and sign SS&D sheets. As written, this procedure would allow an individual that has attended a number of course and perform self-study to review a complex SS&D evaluation program.

Response:

We agree with this comment and the procedure was revised accordingly.

Comment 5:

The procedure should include qualifications for the limited review or an SS&D evaluation program. A number of states either have a few number of manufacturers with simple devices or there is little or no activity with the SS&D registry sheet(s) that they maintain. The use of fully qualified SS&D reviewer is not an efficient use of that individual during an IMPEP review.

Response:

We agree with this comment and the procedure was revised accordingly.

Region III

Comment:

We question the deletion of the Irradiator Technology training course from the Supplemental Training requirements for IMPEP Team Leaders and for principal reviewers of the inspection and licensing performance indicators. Regulation of pool irradiators is an important undertaking for the NRC and Agreement States. As these facilities have significant radiation hazard potential and are at the forefront of our security efforts, we believe that a strong training background for team members, in this area, is important.

Response:

We agree with this comment and the procedure was revised accordingly.

Editorial Comments:

All comments were incorporated into the final version of the procedure.

Region IV

Comment 1:

From a regional perspective there appears to be a need for some changes. Regional DNMS Directors and supervisors should also be listed under "Roles and Responsibilities" as laid out below.

Response:

This procedure was developed to be originally used by the Office of State and Tribal Programs and now the Office of Federal and State Materials and Environmental Management Programs. The procedure was not developed to assign roles and responsibilities to Regional personnel. The Regions are welcome to use the procedure as guidance for how they verify an IMPEP team members qualifications. No changes to the procedure were made as a result of this comment.

Comment 2:

The IMPEP Qualification Form should be modified with a signature block for the candidate's supervisor who certifies that the proper boxes are checked and that the supervisor recommends the candidate for IMPEP team assignments. There should be a similar signature block for the DNMS division director. We don't believe it is necessary for office level (regional administrator) approval, but if it is retained it should be made clear that lower level regional management is making the recommendation. The current form has not been well accepted by regional management, since it lacks this recommendation.

Response:

Office level approval carries over from organization of the former Office of State and Tribal Programs where the Office Director was the immediate supervisor. IMPEP Qualification forms are intended to be signed at the level where the verification of the candidates qualification occurs. The Regional Administrator does not necessarily need to sign the qualification forms, he or she can designate that responsibility to the DNMS Director or the Branch Chiefs, depending on where the level of verification is. No changes to the procedure were made as a result of this comment.

Comment 3:

Also, there should be signatures of the candidate and the supervisor on the Appendix B form(s).

Response:

See response to Region IV's Comment 3.

Comment 4:

Finally, we are surprised that Irradiator Technology (H-315) has been eliminated from the supplemental training lists. This course has proven to be a valuable training opportunity for our staff.

Response:

We agree with this comment and the procedure was revised accordingly.