



FSME Procedure Approval

Conducting Self-Assessments of the Integrated Materials Performance Evaluation Program (IMPEP)

SA-123

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NOTE

Any changes to the procedure will be the responsibility of the FSME Procedure Contact. Copies of the FSME procedures are available through the NRC website.

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I. INTRODUCTION

This document describes the procedure for conducting self-assessments of the Integrated Materials Performance Evaluation Program (IMPEP). This procedure explains the responsibilities of each of the parties involved in conducting an IMPEP self-assessment, the suggested frequency, schedule, scope and documentation of the self-assessments, and response or actions to recommendations made by the IMPEP self-assessment working group.

II. OBJECTIVES

- A. To provide the guidelines to be followed by the working group to conduct IMPEP self-assessments.
- B. To establish the time interval on which IMPEP self-assessments should be conducted.
- C. To provide guidelines to review, capture, and document lessons learned and/or recommendations for IMPEP since its last assessment.
- D. To establish the responsibilities of the individuals and organizations involved in the IMPEP self-assessment process.

III. BACKGROUND

In 1996, the U.S. Nuclear Regulatory Commission (NRC) started implementation of IMPEP as a means of evaluating NRC's nuclear materials program activities and Agreement State radiation control programs. The NRC developed IMPEP to evaluate NRC and Agreement State programs to determine that the programs adequately protect public health and safety and determine whether the Agreement State program is compatible with NRC's program. The Office of Federal and State Materials and Environmental Management Programs (FSME) currently manages IMPEP. Management Directive [\(MD\) 5.6](#), *Integrated Materials Performance Evaluation Program (IMPEP)* provides the overall structure and framework for the IMPEP process and describes the review criteria. NRC developed this procedure in response to the first IMPEP assessment in 2001, the 2009 NRC Inspector General audit, *OIG-09-A-08, Audit of NRC's Agreement State Program*, and the 2010 IMPEP self-assessment. The *OIG* audit identified the need of increased management monitoring of IMPEP operational issues and recommended the development of a mechanism to conduct self-assessments and capture lessons learned for IMPEP on a regular basis.

The working group that conducted the IMPEP self-assessment in 2010 used a methodology similar to the one used by the 2001 IMPEP lessons learned working group, and developed a draft procedure to conduct future self-assessment which served as the basis to this procedure.

IV. ROLES AND RESPONSIBILITIES

A. Director, Division of Materials Safety and State Agreements (MSSA), FSME:

1. Ensures future IMPEP self-assessments are captured in the Division's Operating Plan and the ticket tracking system to ensure IMPEP self-assessments are conducted at its suggested frequency;
2. Determines the scope of the self-assessment review;
3. Determines whether a [MD 5.3, Agreement State Participation in Working Groups](#), NRC/Agreement State working group will be formed, based on the scope of the review, or selects a specialized team to review specific aspects of the IMPEP process;
4. Reviews and approves the working group charter and assigns an individual to lead this task;
5. Provides staffing and resource support to the team or working group members including coordination and confirmation of necessary support from NRC Regional Offices and the Agreement States; and
6. Makes prioritization and resource decisions on implementation of IMPEP self-assessment recommendations.

B. Chief, Agreement State Program Branch (ASPB), FSME:

1. Promotes self-assessments timely completion by making available staff and resources throughout the review;
2. Coordinates with MSSA Director the schedule and scope of future assessments;
3. Reviews IMPEP self-assessment draft report for accuracy; and
4. Ensures that recommendations accepted and endorsed by the MSSA Division Director are acted upon in a timely manner.

- C. IMPEP Project Manager, ASPB:
 - 1. Assists the self-assessment working group by providing and making available resources and experienced staff with IMPEP; and
 - 2. Modifies procedures, training programs, or other IMPEP activities, as appropriate.
- D. Regions, Division of Nuclear Materials Safety:

Provides staffing support for the IMPEP self-assessment team or working group.
- E. Organization of Agreement States (OAS) Executive Board:

Designates the OAS member to work with the IMPEP Project Manager to provide staffing support for the IMPEP self-assessment working group.
- F. Working Group Chair/Co-Chair:

Refer to MD 5.3, for the Working Group Chair/Co-Chair responsibilities.
- G. Working Group Members:

Refer to MD 5.3 for the Working Group member's responsibilities.

V. GUIDANCE

- A. IMPEP Self-Assessments
 - 1. A MD 5.3 working group should be formed to perform IMPEP self-assessment every 5 years in order to ensure Agreement State viewpoints are sought during the assessment and reflected in working group recommendations.
 - 2. This interval may be adjusted if:
 - a. FSME management determines the program is strong enough to sustain a longer interval;
 - b. IMPEP weaknesses are identified by NRC staff, the Office of the Inspector General, the U.S. Government Accountability Office, Agreement States, or others that would suggest the need for a tighter review interval; or

- c. Workload or resource restraints indicate to FSME management, based on health and safety considerations, that resources and efforts involved to conduct the IMPEP self-assessment are needed to perform a different task.
3. If a weakness(es) is identified in a particular area in between routine IMPEP self-assessments and FSME management determines the identified weakness(es) does not warrant a complete review of IMPEP, the MSSA Division Director may assign a team or an individual to assess particular aspects of IMPEP instead of forming a MD 5.3 working group.
- B. Scheduling IMPEP Self-Assessments
1. IMPEP self-assessments must be captured in MSSA's Operating Plans and tracked in one or more agency tracking systems, such as the Electronic Document and Action Tracking System (EDATS) or FSME ticket tracking system, to ensure assessments are conducted at the assigned frequency.
 2. MSSA is responsible for providing resources and personnel necessary to conduct the self-assessment every five years, unless otherwise specified in the previous section.
- C. Assignment of Personnel for IMPEP self-assessments
1. The working group should be comprised of three to five members, who will provide an unbiased analysis of IMPEP with representation from FSME, Regional Offices, and Agreement States in order to obtain a variety of viewpoints and perspectives.
 2. Working group members should have some level of first-hand IMPEP experience, preferably recent, as either a member of the Management Review Board (MRB), an IMPEP team leader, IMPEP team member, and/or Agreement State or Regional person from a materials program reviewed under IMPEP.
- D. Scope of Self-Assessment Review
1. The working group will conduct its review based on a charter that has been prepared and approved by MSSA, in accordance with MD 5.3.
 2. The charter will specify the level of effort and duration of the review depending on the scope of the assessment, although the expectation is that self-assessments be both thorough and complete.

3. The routine self-assessment should include, at minimum, the following components:
 - a. Interviews with IMPEP Stakeholders
 - i. A representative cross-section of IMPEP stakeholders must be interviewed to determine their views on IMPEP effectiveness, efficiency, strengths, and weaknesses.
 - ii. The working group member(s) assigned to conduct interviews may use the sample questions provided in Appendix A as a benchmark to ensure open and proactive discussions with IMPEP stakeholders.
 - iii. This cross-section should include senior NRC managers who have first-hand IMPEP experience, such as Management Review Board (MRB) participants, IMPEP Team Leaders, Regional State Agreements Officers, IMPEP team members, past and current IMPEP Project Managers, MSSA Management, Regional and State participants, especially those whose programs were recently reviewed under IMPEP.
 - iv. If possible, a minimum of 15 interviews should be conducted ensuring representation of each of the stakeholders mentioned above.
 - b. Observation of IMPEP Training
 - i. A working group member(s) should observe the IMPEP training provided to new IMPEP members in order to assess the effectiveness of the training as a means of conveying the IMPEP philosophy and its lessons learned to new members, and to prepare them to conduct their IMPEP duties.
 - ii. The working group should also observe the IMPEP team leader training or assess team leaders' preparation to conduct an IMPEP review in an Agreement State or a Regional Office.
 - c. Observation of IMPEP Teams during Onsite Activities
 - i. Without interfering upon the duties of the IMPEP team, or the program under IMPEP review, working group member(s) should observe at least two onsite IMPEP reviews.
 - ii. If possible, working group member(s) should be able to observe at least one Regional IMPEP and one Agreement State IMPEP.

d. Review of IMPEP Documentation

i. This includes a review of:

1. MD 5.6;
2. Representative sample size of IMPEP reports and periodic meetings summaries;
3. IMPEP internal agency and Agreement States correspondence;
4. State Agreements procedures related to IMPEP activities; and
5. Previous IMPEP self-assessments.

E. Documenting IMPEP Self-Assessment Findings

1. The self-assessment working group will document its results in the form of a written report to the MSSA Division Director or his/her designee.
2. The written report must include, at minimum:
 - a. Objectives and the scope of the work assigned;
 - b. A description of the methodology used to accomplish the working group tasks; and
 - c. Working group's findings and recommendations.
3. The working group should take into account the practicality of its recommendations with respect to the resources that may be required to implement its findings.
4. The working group will provide MSSA Division Director or his designee a draft report for factual review.
5. The working group will issue a final report addressing any factual error or misstatements identified by MSSA Division Director or his designee.

F. Special MRB

If deemed necessary, MSSA Division Director may request to schedule a special MRB to discuss and seek guidance from the MRB on working group recommendations and/or implementation.

G. MSSA Response and/or Actions Based on Working Group Recommendations

1. Any recommendations that have been accepted and endorsed by MSSA management will be tracked to completion in one or more agency tracking systems such as EDATS, FSME or Division tracking systems.
2. The responsibility for implementing any working group recommendation rests within FSME and not in the working group itself, unless otherwise specified in the charter.

VI. APPENDICES

Appendix A – Sample Questions to Conduct IMPEP Self-Assessment Interviews

VII. REFERENCES

1. *Final Working Group Report for the IMPEP Lessons Learned Working Group* (ML021980296).
2. OIG-09-A-08, *Audit of NRC's Agreement State Program* – March 16, 2009 (ML090750622).
3. *Self-Assessment of the Integrated Materials Performance Evaluation Program (IMPEP)* (ML102030228).
4. NRC Management Directive 5.3, *Agreement State Participation in Working Groups*.
5. NRC Management Directive 5.6, *Integrated Materials Performance Evaluation Program (IMPEP)*.

VIII. ADAMS REFERENCE DOCUMENTS

For knowledge management purposes, all previous revisions of this procedure, as well as associated correspondence with stakeholders that have been entered into ADAMS are listed below.

No.	Date	Document Title/Description	Accession Number
1	1/21/11	FSME-11-010 , Opportunity to Comment on Draft Revisions to FSME Procedure SA-123	ML103630011
2	1/21/11	FSME Draft Procedure SA-123	ML103620765

Appendix A

Sample Questions to Conduct IMPEP Self-Assessment Interviews

1. In general, what is your assessment or appraisal of the effectiveness and efficiency of IMPEP?
2. How might either of these dimensions be improved? For example, how might NRC better employ Information Technology to improve efficiency and effectiveness, particularly of the onsite portion of the review?
3. Do the current performance indicators suffice for evaluating Regional and Agreement State programs? Do they adequately capture the attributes of a high performing organization? Would you recommend any new indicators or would you make any changes to the existing indicators? If so, why?
4. How might the concurrence/review process for IMPEP reports be improved? Should the format of the reports be changed (e.g., more bullets, less boilerplate text)?
5. Should the frequency for IMPEP reviews remain at the current 4 year interval or should it be changed? Why?
6. How effective are the periodic meetings between IMPEP reviews?
7. What issues have arisen from IMPEP/MRB reviews that were most difficult to deal with?
8. What changes, if any, would you make to the IMPEP training program?
9. Is NRC selecting the right candidates to serve as team members and team leaders from the Agreement States, Regions, and Headquarters?
10. How is the MRB process working? Does it appear to be meeting the purpose that it was intended to serve?
11. Are the overall findings from the IMPEP process in terms of indicators and conclusions still appropriate? Do we need additional steps?
12. Are there additional NRC programs that need to be included under the umbrella of IMPEP, such as Uranium Recovery licensing in Headquarters? (Applicable to NRC personnel.)
13. What are your thoughts about the resource burden imposed by IMPEP? Is it justified? Which aspects of the program are particularly resource intensive? Do you consider there are better alternatives?

14. What should our expectations be about availability of staff during the onsite week of an IMPEP review?
15. Should our indicator on Technical Quality of Inspections place greater weight on accompaniments, as opposed to review of files?
16. What are your thoughts about the monitoring or heightened oversight processes (particularly important for Agreement States that have been under monitoring or heightened oversight)?
17. The pre-review questionnaire is a central part of the IMPEP process. Does it continue to make sense, especially in light of resource constraints? What alternatives are there to accomplish the same objective? Are the time constraints for receipt, preparation and submittal of the questionnaire reasonable?
18. Is there anything else about IMPEP that you would like to discuss?