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NUCLEAR REGULATORY COMMISSION  
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(FSME-11-010, January, Program, SA-123)

January 21, 2011

ALL AGREEMENT STATES, MICHIGAN

OPPORTUNITY TO COMMENT ON DRAFT OFFICE OF FEDERAL AND STATE MATERIALS AND ENVIRONMENTAL MANAGEMENT PROGRAMS PROCEDURE SA-123, "CONDUCTING SELF-ASSESSMENTS OF THE INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM" (**FSME-11-010**)

**Purpose:** To provide the Agreement States with the opportunity to comment on the Office of Federal and State Materials and Environmental Management Programs (FSME) draft procedure SA-123, "Conducting Self-Assessments of the Integrated Materials Performance Evaluation Program (IMPEP)."

**Background:** This procedure was developed as a result of the first IMPEP assessment in 2001, the 2009 U.S. Nuclear Regulatory Commission (NRC) Office of the Inspector General audit, OIG-09-A-08, "Audit of NRC's Agreement State Program," and the 2010 IMPEP self-assessment.

**Discussion:** Enclosed for your review and comment is the draft FSME Procedure SA-123, "Conducting Self-Assessments of the Integrated Materials Performance Evaluation Program." This procedure provides guidance to conduct future self-assessments of the IMPEP. We would appreciate receiving your **comments within 30 days from the date of this letter<sup>1</sup>** addressed to the point of contact named below.

If you have any questions regarding this communication, please contact me at 301-415-3340 or the individual named below.

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/RA/

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Enclosure:  
FSME SA-123 Proposed Draft Procedure

<sup>1</sup> This information request has been approved by OMB 31 50-0029 expiration 11/30/2013. The estimated burden per response to comply with this voluntary collection is approximately 8 hours. Send comments regarding the burden estimate to the Records and FOIA/Privacy Services Branch (T-5F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by Internet e-mail to [infocollects@nrc.gov](mailto:infocollects@nrc.gov), and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-1 0202 (3150-0029), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection 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, the information collection.



## FSME Procedure Approval

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

## SA-123

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Issue Date:

Review Date:

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Robert J. Lewis  
*Director, MSSA*

*Date:*

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A. Duncan White  
*Branch Chief, MSSA*

*Date:*

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Leira Cuadrado  
*Procedure Contact, MSSA*

*Date:*

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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.***



**Procedure Title:**  
***Conducting Self-Assessments of the  
Integrated Materials Performance  
Evaluation Program (IMPEP)***  
**Procedure Number: SA-123**

**Page: 1 of 7**

**Issue Date:**

## **I. INTRODUCTION**

- A. This document describes the procedure for conducting self-assessments of the Integrated Materials Evaluation Program (IMPEP). Explained in this procedure are the responsibilities of each of the parties involved in the process, the suggested frequency and schedule of self assessments, the scope and documentation of the assessment, and response to findings.

## **II. OBJECTIVES**

- A. To provide the guidelines to be followed by the working group chartered to conduct IMPEP self-assessments.
- B. To establish the time interval on which IMPEP self-assessment should be conducted.
- C. To provide minimum work scope guidelines to review, capture, and document lessons learned and recommendations of the 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 the IMPEP as a means of evaluating NRC's nuclear materials program activities and Agreement State radiation control programs. The IMPEP was developed to assure that public health and safety are adequately protected from the hazards associated with the use of radioactive materials and to assure Agreement State programs are compatible to NRC's program. IMPEP is currently managed by the Office of Federal and State Materials and Environmental Management Programs (FSME). Management Directive 5.6, "Integrated Materials Performance Evaluation Program (IMPEP)" provides the overall structure and framework for the IMPEP process and describes the review criteria. This procedure was developed as a result of 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.

## **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 timely resource designation for this task;

2. Determines the scope of the self-assessment review;
3. Based on the scope of the review, determines whether a Management Directive (MD) 5.3 NRC/Agreement State working group will be formed, or selects a specialized team to review specific aspects of the IMPEP process;
4. If a MD 5.3 working group is formed, MSSA Division Director will review and approve the working group charter and will assign 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 Regions and the Agreement States;
6. Makes prioritization and resource decisions on implementation of the IMPEP self-assessment recommendations.

**B. Chief, Agreement State Program Branch**

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 the IMPEP self-assessment draft report for factual errors or misstatements;
4. Ensures that recommendations accepted and endorsed by MSSA Division Director are acted upon in a timely manner.

**C. IMPEP Project Manager:**

1. Assist the self-assessment working group by providing and making available resources and staff associated with the IMPEP process; and,
2. Modifies procedures, training programs, or other IMPEP activities, as appropriate.

**D. Regions, Division of Nuclear Materials Safety:**

1. Provides staffing support for the IMPEP self-assessment team or working group.

- E. Organization of Agreement States:
  - 1. Based on agreements reached with the MSSA Director, provides staffing support for the IMPEP self-assessment working group.
- F. Working Group Chair/Co-Chair:

MD 5.3 “Agreement State Participation in Working Groups” states the Working Group Chair/Co-Chair responsibilities.
- G. Working Group Members:

MD 5.3 “Agreement State Participation in Working Groups” states the Working Group member’s responsibilities.

**V. GUIDANCE**

- A. IMPEP Self-Assessments
  - 1. Comprehensive IMPEP self-assessments should occur at four to six year intervals.
  - 2. This interval can 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.
    - c. Workload or resource restraints would suggest 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. A MD 5.3 working group should be formed to perform a routine IMPEP self-assessment every four to six years in order to ensure Agreement State viewpoints are sought during the assessment and reflected in working group recommendations.
  - 4. If weaknesses are identified in a particular area in between routine assessments, and FSME management determines it does not warrant a complete review of the Program, MSSA Division may assign a team or an individual to assess particular aspects of the IMPEP instead of forming a MD 5.3 working group.

**B. Scheduling IMPEP Self-Assessments**

1. IMPEP self-assessments must be captured in MSSA Division's Operating Plans and tracked in one or more Agency tracking systems, such as EDATS or FSME tracking system, to ensure assessments are conducted at the assigned frequency.
2. MSSA Division is responsible for providing resources and personnel necessary to conduct the self-assessment in a timely manner, 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 the 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 but not necessarily recent, as either a member of the Management Review Board, 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 the MSSA Division, in accordance with MD 5.3.
2. The charter will specify the level of effort and duration depending on the scope of the assessment, although the expectation is that self-assessments be both thorough and complete.
3. The 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 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 Agreement Officers, IMPEP team members, past or 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, a 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. Management Directive 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 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 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.

F. Special MRB

If deemed necessary, MSSA Division 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 Division 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. APPENDIXES**

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*.

**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.

<b>No.</b>	<b>Date</b>	<b>Document Title/Description</b>	<b>Accession Number</b>
1		FSME-xx-xxx, Opportunity to Comment on Draft Revisions to FSME Procedure SA-123	ML103630011
2		FSME Draft Procedure SA-123	ML103620765
3		FSME-xx-xxx, Final FSME Procedure SA-123	

# 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 the IMPEP program?
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 gradations?
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?