

ISSUES FOR AGREEMENT STATES



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Agenda

- Overview of the Integrated Materials Performance Assessment Program (IMPEP)
- Review of Issues Identified by the U.S. Nuclear Regulatory Commission (USNRC)
- Potential Solutions

Overview of IMPEP Program

- Integrated Materials Performance Assessment Program
- U.S. Nuclear Regulatory Commission's Agreement State inspection program
- Areas of inspection (MD 5.6)
 - Common Performance Indicators
 - Technical staffing and training
 - Status of materials inspection program
 - Technical quality of inspections
 - Technical quality of licensing actions
 - Technical Quality of incident and allegation activities
 - Non-Common Performance Indicators
 - Regulatory/statutory compatibility requirements
 - Sealed sources and devices
 - Low-level radioactive waste
 - Uranium recovery

Overview of IMPEP Program (cont'd.)

- Guidance documents are basis of review
 - SA Series: SA-100 (General Implementation)
 - SA-101 through -105 (Common), -107 through -110 (Non-Common)
 - Inspection Manual Chapter Series
 - Management Directives 5.6 and 5.9
- Inspection Frequency (SA-100)
 - Normally, USNRC Regional and Agreement State program reviews are scheduled every four years;
 - Interval may be shortened or lengthened to another appropriate interval based on the review team's recommendation
 - Separate trips to perform specific parts of an IMPEP review are permitted and may be advantageous to the Agreement State and/or USNRC. Examples are accompaniments of inspectors and visits to specific licensed facilities. Such activities; however, should be completed prior to the review exit meeting.
- USNRC might be moving to remote IMPEP inspections due to COVID-19

Overview of IMPEP Program (cont'd.)

- Follow-up reviews – limited evaluation specific to findings
- Special reviews – address specific challenges facing a program
- Implementation
 - Review questionnaire
 - Offsite review
 - Onsite review
 - Inspection observations
 - Personnel interviews
- IMPEP staff
 - USNRC personnel
 - Agreement State personnel – SA-120

Review of Issues Identified by the USNRC

- Adequacy and compatibility with USNRC Regulations
- Training and qualification programs were not compatible with appropriate Inspection Manual Chapters
- Inspection results not communicated to licensees in a timely fashion or poorly documented
- Failure to implement inspection procedures
- Insufficient training of inspectors
- Inadequate licensing procedures
- Inadequate incident and allegation investigation execution
- Inadequate staffing or staff retention
- License application or amendment application reviews that did not meet requirements of guidance
- Documentation of training and experience for users of radioactive materials.

Potential Solutions

- Adequacy and Compatibility with USNRC Regulations
 - Before proposing new regulations, meet with USNRC, Agreement State Program staff to discuss the regulations to ensure that no conflicts exist.
 - Engage industry experts to review regulations prior to promulgation to identify potential problems.
- Training and qualification programs were not compatible with appropriate Inspection Manual Chapters
 - Ensure that checklists are developed and that management reviews and signs checklists
 - Ensure that training programs include all necessary topics found in IMCs; use IMCs, Management Directives as training guides
 - Ensure training includes both classroom learning and field demonstrations
 - Confirmation of training should be required:
 - Tests
 - Field Practicals

Potential Solutions (cont'd.)

- Inspection results not communicated to licensees in a timely fashion or poorly documented
 - Ensure that standardized inspection forms are utilized
 - Ensure that managers are observing inspections to determine if inspections are being properly performed and documented
 - Ensure that training addresses proper documentation and communication of inspection findings
 - Develop a tracking database or spreadsheet with appropriate deadlines to ensure that inspection results are communicated promptly.
- Failure to implement inspection procedures
 - Review inspection procedures to ensure completeness and compatibility with NRC Regulations
 - Review inspection training procedures to ensure proper training
 - Retrain inspectors through classroom education and field practicals
 - Training and procedures reviews could include third-party services

Potential Solutions (cont'd.)

- Insufficient training of inspectors
 - Review inspection training procedures to ensure proper training
 - Retrain inspectors through classroom education and field practicals
 - Training and procedures reviews could include third-party services
- Inadequate licensing procedures
 - Review license review procedures
 - Develop new procedures that are consistent with guidance documents (NUREG-1556, -1569)
 - Retrain licensing staff
 - Classroom training
 - Management reviews of licensing documents

Potential Solutions (cont'd.)

- Inadequate incident and allegation investigation execution
 - Review incident and allegation procedures
 - Ensure that proper forms for documenting initial contacts are properly developed
 - Ensure that all personnel understand confidentiality regulations
 - Determine the need to train specific personnel for addressing incidents and allegations
 - Retrain all responsible personnel on procedures
 - Classroom training
 - Drills
- Inadequate staffing or staff retention
 - Inadequate staffing could be budget related.
 - Poor staff retention could be related to:
 - Salary
 - Unsatisfactory job responsibilities
 - Unsatisfactory relationship with management

Potential Solutions (cont'd.)

- Poor work environment
- Harassment/HR issues
- Although causes for poor staff retention are outside the scope of the AEA, the ramifications are within the scope
 - Reduced effectiveness in implementing the Agreement State program
 - Reduced effectiveness in protecting public health and the environment
 - Reduced effectiveness in controlling regulated materials
- Human resources support, either internal or external, would be needed to resolve some retention issues.

Potential Solutions (cont'd.)

- License application or amendment application reviews that did not meet requirements of guidance
 - Retrain licensing staff
 - Classroom training
 - Sample license application review
 - Management inspection of licensing review

QUESTIONS

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