



2010 IMPEP Self-Assessment

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OAS Annual Meeting
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March 2009 OIG Audit

Finding 1: Management does not effectively monitor operational issues

Recommendation 1: Develop a mechanism for conducting self assessments and capturing lessons learned on a regular basis

FSME agreed with Recommendation 1

- Conduct a self-assessment
- Develop a mechanism for future self-assessments

Early 2010 activities:

- Developed Charter
- Reached out to OAS/CRCPCD/Regions for team members
- Identified lead for team

March 2010—First meeting of team

- Revised charter---10 tasks
- Agreed on approach
- Assigned specific work items

Major team work activities

- Review OIG report
- Conduct stakeholder interviews
- Review program guidance/procedures
- Review IMPEP reports/documentation
- Audit 2010 training
- Observe 3 IMPEP teams (TX, Reg I, AL)

Findings

- Program is fundamentally sound
- Effective, fair and consistent in evaluating AS and Regional programs
- Benefits
 - Independent assessment
 - Raises visibility of program within State government

Recommendations

- Total of 15 recommendations to make program more efficient and effective
- Characterized as either “Substantive” (8) or “Enhancement” (7)
- Full report and recommendations in ADAMS
- Highlights of several of the substantive recommendations

Recommendation 1

- Common performance indicators remain effective and no new ones needed
- Security should be integrated into existing framework and not as separate indicators

Recommendation 2

- Treatment of reciprocity inspections should be more performance-based
- Current 20% inspection goal should be removed
- Two options to achieve this

Recommendation 3

- No changes to existing gradations of performance (Satisfactory, etc.)
- Recommended extension of IMPEP interval from 4 to 5 years for a program receiving two reviews with all Satisfactory findings

Recommendation 8

- Significant comment and discussion on Heightened Oversight and Probation
- For IMPEP to have credibility, there needs to be explicit criterion for Probation
- Team recommended that SA-113 procedure be modified to more clearly state when Probation will be considered

Recommendation 10

- Consensus that accompaniments provide better measure of technical quality of inspection than file review
- Team recommended that IMPEP reviews seek to accompany 50% of a program's inspectors, regardless of program size
- To minimize resource burden, spread out accompaniments over 4 year cycle

Recommendation 14

- Consensus view that additional FSME functions would benefit from IMPEP review
- Recommendation to expand scope to include uranium recovery, complex decommissioning, exempt distribution licensing and general licensing

Recommendation 15

- Critical self-assessments are important to a strong program
- Interval between them should be long enough to allow for a range of issues to emerge; at least a full IMPEP cycle
- Recommendation that future self-assessments be done on a 4-6 year frequency

Next Steps

- Report is with FSME management
- Special MRB in early September to discuss findings and recommendations
- Disposition of recommendations will be considered by FSME in light of resources and other priorities
- Coordination on path forward with OAS and CRCPD