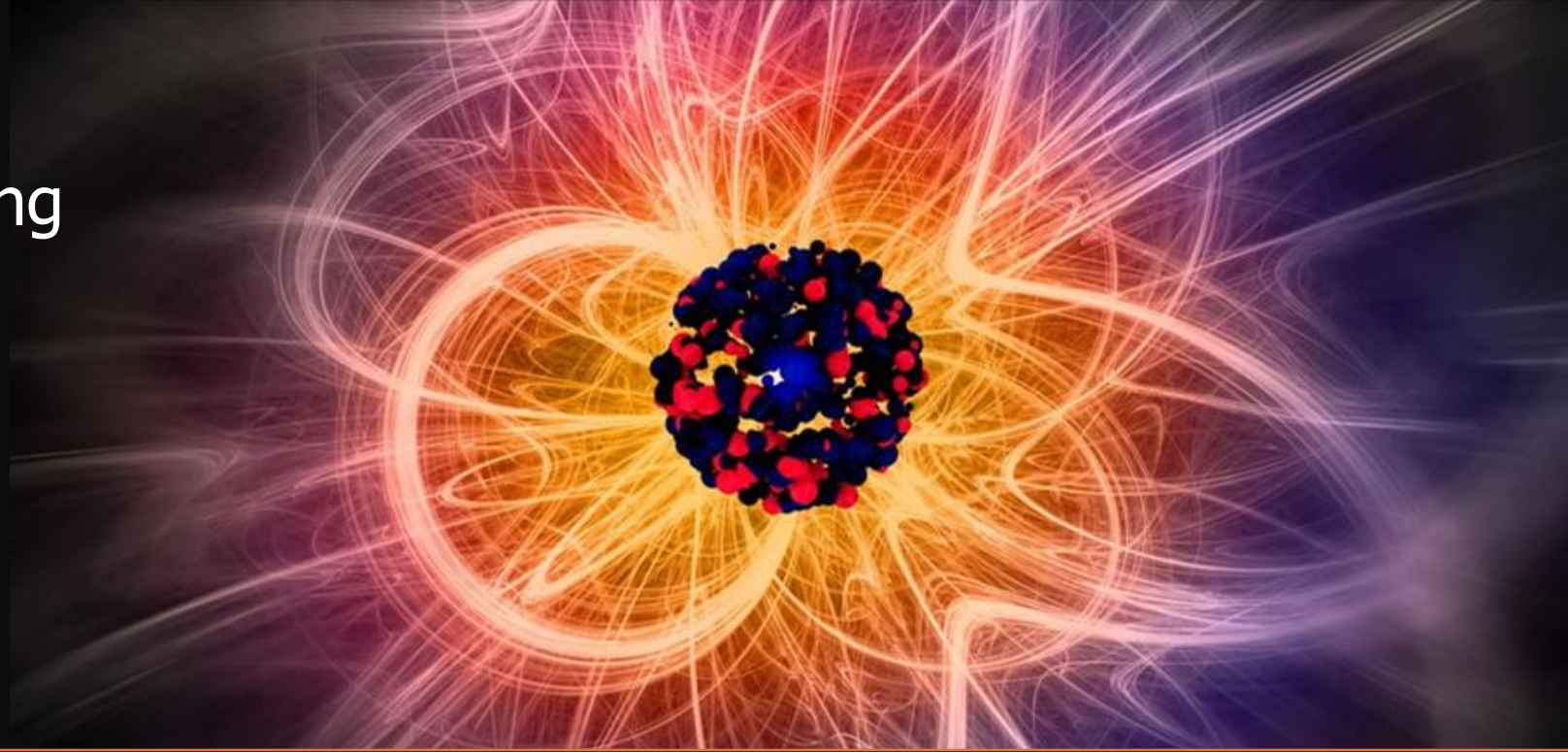


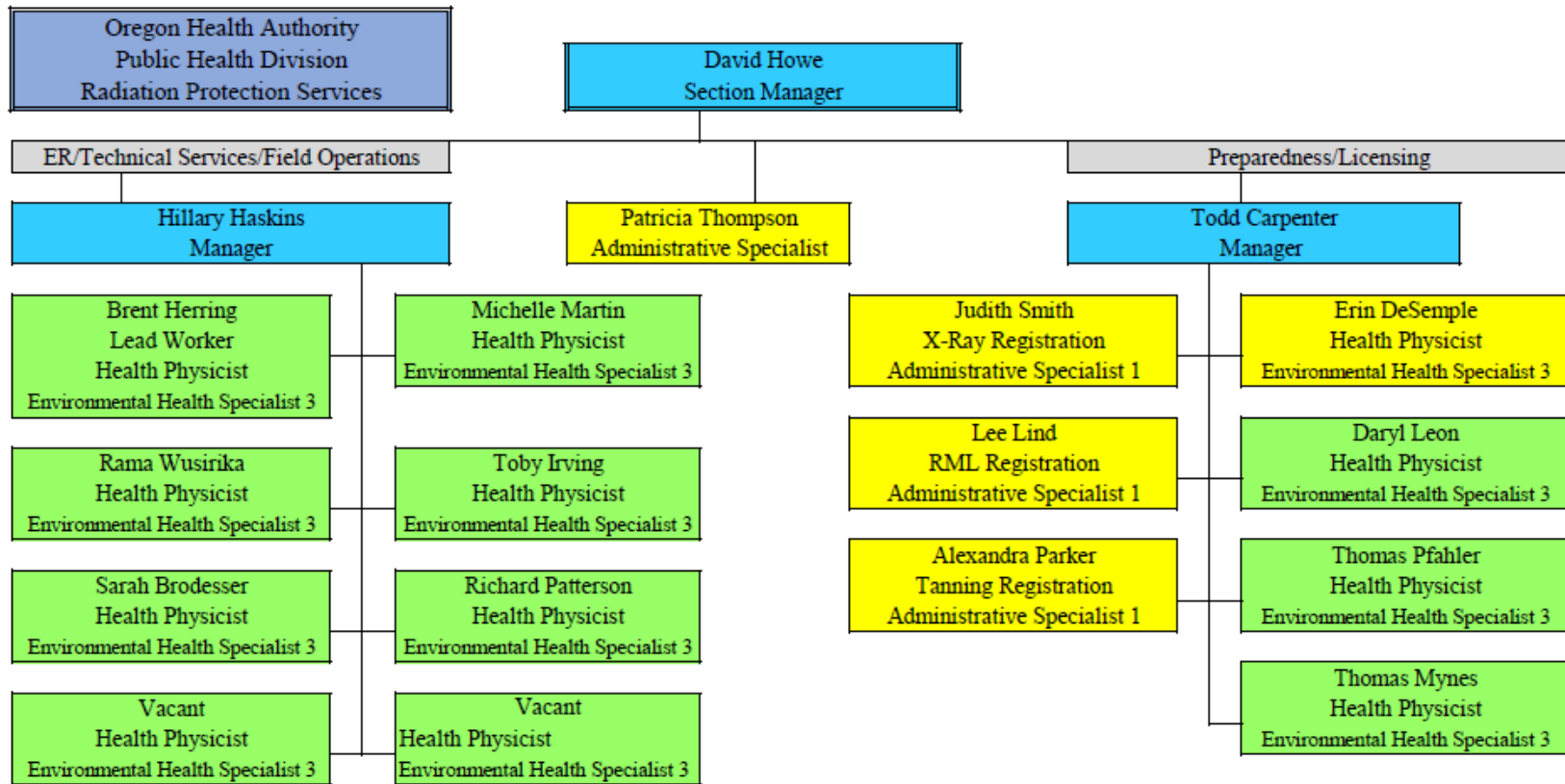
2025 OAS Annual Meeting  
August 14th



**“The Oregon IMPEP Story...Lessons Learned”**

**David Howe  
Program Director**

# OREGON RADIATION PROTECTION SERVICES (RPS) PROGRAM STRUCTURE



## A BRIEF OVERVIEW

# FROM “HEIGHTENED OVERSIGHT” THROUGH “MONITORING”

### \*2006-2007

\* Full IMPEP

Heightened Oversight

Program Improvement Plan - 4 Satisfactory – Needs Improvement

Quality of Licensing and Inspections, Rule Compatibility, and  
Incident & Allegations

2 Satisfactory – Technical Staffing & Training, Status of  
Materials Inspection Program

### 2008-\*2009

Off Heightened Oversight

Closed Recommendations –

Inspection Report Audits, Supervisory

Accompaniments, Incident Database Improvement

On Monitoring

3 Satisfactory - Needs Improvement

Quality of Inspections, Quality of Licensing Actions,  
and Quality of Incident & Allegation

3 Satisfactory

Technical Staffing & Training, Status of Material  
Inspection Program, Rule Compatibility

### 2010

Periodic Meeting

Off Monitoring – 3 Recommendations Fully Addressed

# A BRIEF OVERVIEW

## FROM “OFF MONITORING TO SATISFACTORY”



\*2013

4 Satisfactory

Technical Staffing/Training, Quality of Inspections, Status of Material Inspection Program – Sensitive Unclassified Non-Safeguards Information (SUNSI), Rule Compatibility

2 Satisfactory – Needs Improvement

Quality of Licensing Actions – Inconsistent Documents

Quality of Incident & Allegations – Nuclear Material Event Database (NMED) Reporting

Closed 2 Recommendations

Technical Staffing & Training – Training Journal

Technical Quality of Inspections – SUNSI Labeling

Kept 1 Open

Rule Compatibility – Develop Implementation Protocol

Added 5 New Recommendations

Quality of Licensing Actions – Reimplement Peer Review Process, Verify All Authorized Users (AUs), Implement a Pre-Licensing Protocol

Quality of Incident & Allegations – NMED Documentation, Promote Timely Completion via Protocol Use

\* Full IMPEP

# A BRIEF OVERVIEW

“BEING  
SATISFACTORY  
ONTO A 5-YEAR  
CYCLE”

**\*2017**

Satisfactory for All 5 Performance Indicators

Closed 6 Recommendations

1 New Recommendation

Audit Licensee's For Coding/Inspection Frequencies

**\*2021**

Satisfactory for All Performance Indicators

Closed 1 Recommendation

1 New Recommendation

Audit Incident & Allegation Documents

[Moved to 5-Year Review Cycle]....“The Reward”

**\*2026**

???????

\* Full IMPEP

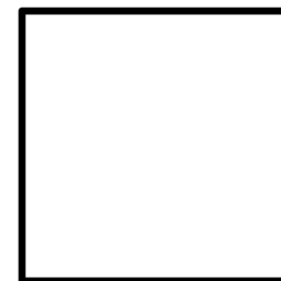
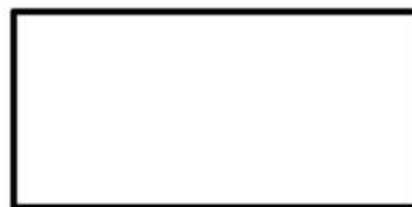
# 10 LESSONS LEARNED

1. "Fail to Prepare...Prepare to Fail" (Benjamin Franklin)
  - In other words, invest the time and energy NOW or plan to invest even more time and energy later

2. "Documentation is Your Friend"  
(i.e., Protocols, Inspection Reports/licensing, Accompaniments, Training Journals)

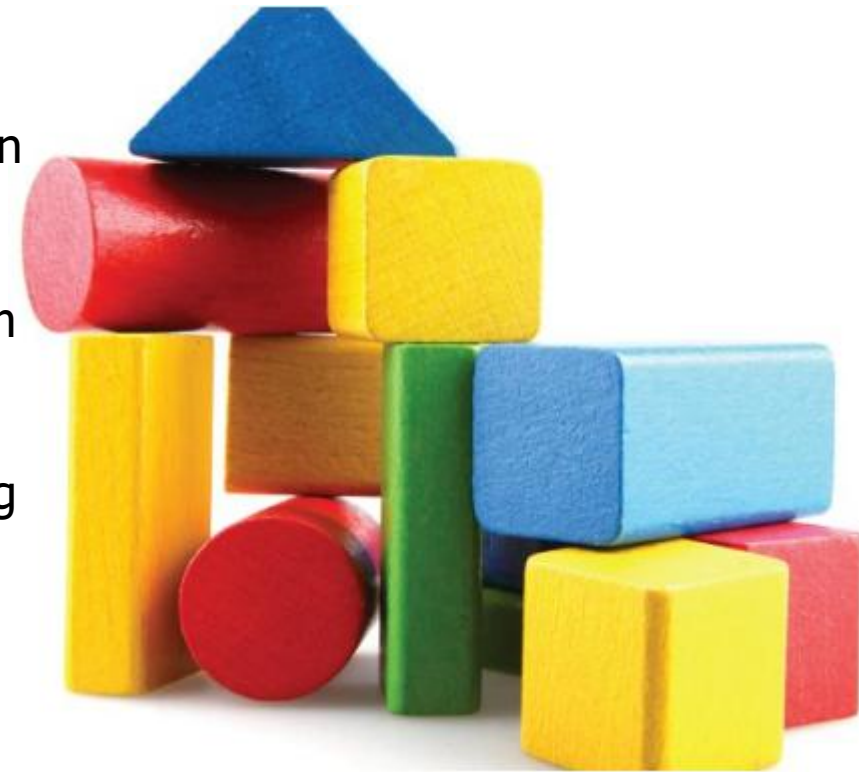


3. "Practice Form-Flex"
  - View IMPEP as a "dotted box" that can change form (i.e. square to rectangle)
  - IMPEP offers structure and consistency for auditing Agreement States (AS), but IMPEP Rules/staffing can change, requiring flexibility by both NRC and AS



# 10 LESSONS LEARNED CONT.

4. "Recognize that IMPEP is an Evolving System"
  - Performance measures (performance indicators) and their attainment are evaluated by a cast of changing NRC and AS personnel
  
5. "The Only Constant is Change"
  - The involvement of different staff creates different "IMPEP Personalities"
  
6. "Open and Regular Communication Is Essential"
  - Between NRC State Liaison Officers (SLO's), the IMPEP team and State Radiation Control Program Staff
  - It's the building block to having positive relationships



# 10 LESSONS LEARNED CONT.

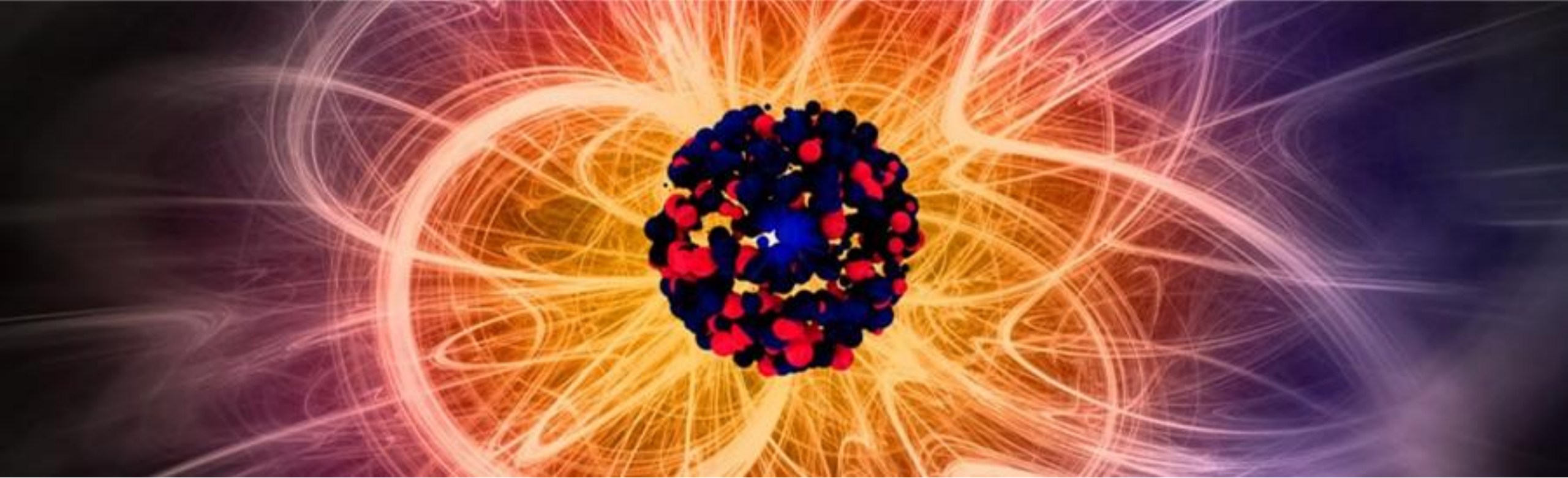
7. "Create an IMPEP Preparation Plan and delegate Performance Indicators"
  - Promotes teamwork, accountability and knowledge
8. "Two-Deep Staffing Helps ensure a Successful IMPEP"
  - Remember Form-Flex
9. "There are No IMPEP Journey Rest Stops"
  - Just when you think you've made it there will always be something to correct...Commit to completing internal audits
10. "The End is Never Ending....."



# 10 LESSONS LEARNED

1. "Fail to Prepare...Prepare to Fail"
2. "Documentation is Your Friend"
3. "Practice Form-Flex"
4. "Recognize that IMPEP is an Evolving System"
5. "the Only Constant is Change"
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7. "Create an IMPEP Preparation Plan and delegate Performance Indicators"
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9. "There are No IMPEP Journey Rest Stops"
10. "The End is Never Ending....."

# Questions?



Contact info:

[david.m.howe@oha.oregon.gov](mailto:david.m.howe@oha.oregon.gov)

work cell/503-545-3100