



Management Directive 5.6 – Integrated Materials Performance Evaluation Program (IMPEP) and Related State Agreement (SA) Procedure Revisions

MANAGEMENT DIRECTIVE 5.6

The revised MD 5.6 was issued on July 24, 2019

Changes impacting the Management Review Board:

- The Chair of the MRB will make the final determination regarding the overall assessment of the NRC or Agreement State's program as an outcome of an IMPEP review and the MRB's deliberations.
- If the Agreement State disagrees with the MRB Chair's decision to continue or enter a period of monitoring or heightened oversight, the State may appeal that decision to the Executive Director of Operations (EDO).

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In terms of general guidance for the IMPEP review team:

- A finding of "satisfactory" should be considered when none or only a few or small number of the cases or areas reviewed involve performance issues/deficiencies (e.g., inspection, licensing, staffing, etc.)
- An "unsatisfactory" finding should be considered when a majority or a large number of cases or areas reviewed involve performance issues/deficiencies, especially if they are chronic, programmatic, and/or of high-risk

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In terms of general guidance for the IMPEP review team:

- A finding of "satisfactory, but needs improvement" should be considered when more than a few or a small number of the cases or areas reviewed involve performance issues/deficiencies in high-risk-significant regulatory areas, but not to such an extent that the finding would be considered unsatisfactory.

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- MD 5.6 was revised to refer to the applicable SA procedures for more specific guidance the MD (e.g., examples, Questions & Answers, etc.).
- Defines a Follow-up IMPEP Review.
- Defines an IMPEP Special Review.
- Compatibility Requirements renamed “Legislation, Regulations and Other Program Elements”.
- Matched (provided parallel) performance criteria for the different findings (satisfactory, satisfactory but needs improvement, unsatisfactory).

Next Steps - Revision SA Procedures

- Revise SAs containing MD 5.6-related content
- 15 SA procedures identified
 - Common-performance indicators
 - Non-common performance indicators
 - Management Review Board
- 11 working groups for the 15 SA procedures
- Working group charter has been developed
- Interim Guidance Approach will be used for all 15 SA procedures

Revision of SA Procedures

Completed steps

- NRC co-chairs have been identified for all 11 working groups
- NRC co-chairs have developed draft Interim SA procedures consistent with changes in MD 5.6

Remaining short-term steps

- Identify Agreement State co-chairs and members for all 11 working groups.
- Complete development of Interim SA procedures

Piloting the Interim Guidance Approach

Sept 2019: Identify Agreement State working group member(s)

Sept - Nov 15 2019: Complete Interim SA procedures.

Nov 15 - Dec 1 2019: Consistency review by Editorial Board and issuance of Interim SA procedures.

Dec 2019 - April 1, 2020: Comment period for Interim SA procedures.

Dec 2019 - July 31, 2020: Interim SA procedures in use.

April 2 - August 1, 2020: Address comments and issue final SA procedures.

Revision of SA Procedures

Agreement State working group members:

- Review relevant sections of revised MD 5.6.
- Review and comment on draft Interim SA procedures.
- Provide input/feedback on criteria examples and Questions & Answers in draft Interim SA procedures.

Expectations/qualifications for working group members:

- Qualified in the performance indicator.
- IMPEP experience in the performance indicator.
- Sufficient available time in September – December 2019 timeframe to participate.

Procedure	Level of Effort	Duration
SA-100 - Implementation of IMPEP	35 hours	2 months
SA-101 - Status of Materials Inspection Program SA-102 – Technical Quality of Inspections SA-103 – Technical Staffing and Training SA-104 – Technical Quality of Licensing SA-105 – Technical Quality of Incidents and Allegations SA-106 (and incorporate SA-121) - Management Review Board (and Agreement State Liaison to the MRB)	10 hours each	1 month each
SA-107, SA-200, SA-201, and SA-202 – Compatibility related procedures	40 hours	2 months
SA-108 – Sealed Source and Device Evaluation Program SA-109 – Low Level Radioactive Waste Disposal Program SA-110 – Uranium Recovery Program	20 hours each	2 months each