

# Process and Documentation of IMPEP Reviews

Recommendations from the NMP and  
IMPEP Working Group

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# Tasking for the NMP and IMPEP Working Group

Formulate innovative ideas and determine whether there are opportunities to streamline the process for and documentation of the results of IMPEP reviews of Agreement State and NRC Program

## **Working Group Recommendations for IMPEP reviews**

- Significantly reduce the length of the IMPEP report
- Use the IMPEP questionnaire as a more integral part of the IMPEP report
- IMPEP culture considerations
- Encourage use of electronic reviews
- Encourage use of self-assessments
- Management Review Boards
- Structure of IMPEP review

## Significantly Reduce the Length of the IMPEP Report

- Provide no details unless a performance issue is identified
- Provide a short letter or summary if the performance indicators are all satisfactory
- IMPEP reports are important sources of feedback to the Agreement States. Include positive aspects of the program
- The level of resources have historically been a root cause of performance issues and should be the focus of the report

## **Significantly Reduce the Length of the IMPEP Report - Continued**

- Guard against changes caused by different management styles in the content and level of detail in the report
- Signature authority for draft report should be given to the Team Leaders or even a third party to prepare
- Use IMPEP questionnaire as the “body” of the report that contains the details. The report itself will be short and high level
- Consider adding a self-assessment prepared by the subject agency under review as part of the report

## Use the IMPEP Questionnaire as a More Integral Part of the IMPEP Report

- Use questionnaire as the “body of the report.”
- Revise the questionnaire to request additional information up front to help shorten or make the on-site review more efficient; Need to balance what is fair to request and what is needed to make the review efficient
- Information such as incidents identified in the questionnaire should be risk informed – identify which one involved high risk activities or licensed material

## Use the IMPEP Questionnaire as a More Integral Part of the IMPEP Report - Continued

- Other considerations for the questionnaire to make the review more efficient

Use existing electronic information to fill in information

Ask about agency's electronic records capabilities

Ask for total number of actions completed for each indicator, such as allegations

## IMPEP Culture Considerations

- Define what an IMPEP review is. Is it an audit? Is it a performance-based review?
- Interactions and exchange of information are important during IMPEP reviews. More exchange of information will help improve and positively change the IMPEP process.
- Time with NRC during IMPEP reviews and MRB are valued – provides feedback

## Encourage use of Electronic reviews

- Assess the need of a memorandum of understanding for sharing information maintained on WBL or other platforms
- Include the review of regulations and legislation as part of electronic reviews
- Most states do not have all licensing/inspection documents in an electronic formats – IMPEP teams will still need to go onsite

## Encourage use of Electronic reviews - Continued

- Take full advantage of programs that have electronic systems that can be accessed prior and during the on-site review
- Understanding of State's electronic capabilities should be determined early in the IMPEP planning process

## Encourage Use of Self-Assessments

- Regardless of the quality of the self-assessment and the corrective action performed by the agency, the NRC will also need to perform some level of review
- Give “credit” to an agency for performing a self-assessment and taking effective corrective actions. One “credit” could be a reduction in the overall scope of the IMPEP review
- NRC should develop a tool to promote consistency on what is in an agency performed self-assessment
- NRC should review the agency performed self-assessment well ahead of the scheduled IMPEP review

## Management Review Boards (MRB)

- If there are no performance issues and indicator ratings are satisfactory, no need to hold an MRB
- Make the MRB more efficient and save resources by greater use of video/Skype (and less travel)
- Reduce the MRB review process for final reports by either agreeing to edits at the MRB or limit completion of final report between the team leader, IMPEP project manager and the MRB Chair or their designee
- Reduce the length of the MRB by limiting the presentation of the team to an overview of the entire report by the team leader

## Management Review Boards (MRB) - Continued

- If you have an MRB, you open the report to any aspect of the review conducted by the team – can there be a “short” MRB? Should the MRB chair be empowered to limit discussion when there are no performance issues?
- Focus MRB discussion only on performance issues and positive aspects of the review. Do not focus on individual casework
- MRB members should go to an IMPEP review and see the Agreement States as their partners

## Structure of IMPEP Review

- Support consolidated review of NRC as is currently done in other multi-agency Agreement States
- The scope of the NRC review should be the same areas as any Agreement State program, including regulation development timeline of three years
- Review of incidents should be limited to high risk ones, events involving general licensed devices are low risk and should not be reviewed

## Structure of IMPEP Review - Continued

- Given the differences in general licensing program implementation from agency to agency, should not be part of IMPEP due to its low risk
- Include waste processing and other alternative disposal pathways in IMPEP review due to their complexity and potentially high-risk safety risks of the licensee's operations