

National Materials Program Pilot Project 5
Writing Team to Revise IMC 2800, Materials Inspection Program, February 28, 2002,
as amended January 15 and August 15, 2003, for the National Materials Program Pilot Projects
[SRM-SECY-02-0107-SECY-02-0074-SECY-01-0112, August 20, 2002]

Charter

Objectives

In order to implement Phase I and Phase II recommendations and conserve resources for the materials program in the remainder of FY02 and thereafter, the Writing Team (WT) is chartered to revise IMC 2800 and its associated non-medical Inspection Procedures (IP) and non-medical Temporary Instructions (TI) in order to align the materials inspection program with the risk-informed and performance-based regulatory approach.

The WT may incorporate innovative approaches not included in Phase I and II recommendations for the implementation of the inspection process to achieve long-term increases in effectiveness and efficiency.

In order to obtain information on the feasibility and viability of the NMP-"Alliance" option, the WT will solicit Agreement State participation for the work described below.

Background

On November 14, 2000, the Mallinckrodt Lessons Learned Task Group Report (Phase I) recommended specific actions to NMSS as short-term changes, long-term changes, rulemaking, referral to Phase II (review of the entire materials program), and referral to the National Materials Program Working Group. The Phase I recommendations addressed IMC 2800 and IP 87110-series that describe the materials inspection program. NMSS developed an action plan that was provided to the Phase II Review Group.

On August 13, 2001, the Phase II Byproduct Materials Review Report endorsed the majority of the recommendations that had been referred by Phase I, thereby encouraging NMSS to complete action on those items. Phase II recommended broad changes to NMSS policies, procedures, and processes to improve effectiveness and gain efficiencies to save NMSS resources for the materials program. Phase II recommendations addressed IMC 2800 changes and provided resource estimate costs and savings for implementation of each recommendation.

With input from the Regional Administrators, NMSS considered this information and committed to implement the Phase II recommendations, including the endorsed Phase I recommendations. NMSS decided not to consider any impacts from potential additional security measures resulting from the September 11 terrorist activities at this time. NMSS will consider impacts from security considerations based on information available from the Commission.

Scope of Work

The WT will revise IMC 2800, IP 87110-series, and TIs to implement the following Phase II recommendations that specifically addressed IMC 2800:

- II-5 (revise inspection priorities),
- II-9 (inspector empowerment),
- II-10 (streamlined inspection preparation),
- II-11 (initial inspections),
- II-12 (field office inspections), and
- II-16 (expanded use of NRC Form 591).

The WT will not validate the risk-informed inspection priorities determined by the Phase II Review Group. Implementation of II-6 (periodic assessment) will provide the opportunity to revisit this issue in the future.

The WT may select additional Phase I and II recommendations to be included in the revisions, e.g., II-6 (periodic assessment) and II-7 (performance-based IP's).

The WT will initiate a Temporary Instruction for the revised Materials Inspection Program (TI 2800/033) in order to evaluate resource savings for the materials program. The WT will incorporate selected Phase I and II recommendations for IMC 2800 into TI 2800/033. The revisions to the IP 87110-series will not include the interim compensatory measures (ICM). A separate TI may be developed by other staff for the ICM. However, if

information is available from staff actions regarding security that could influence the routine inspection program, this information will be considered in the final version of IMC 2800.

The WT will revise the seven non-medical IPs (87110, 87111, 87112, 87113, 87114, 87117, 87120) and will coordinate during this period with another writing team that will be revising the four medical IPs (87115, 87116, 87118, and 87119) for the implementation of revised Part 35.

The WT will analyze TI 2800/033 and the revised inspection procedures, prepare final versions of IMC 2800 and the associated inspection procedures, and provide a lessons learned report for the NMP Pilot Projects.

Working Group Membership, Organization and Operations

Under the expedited process, the roles of the WT and Pink/Red Team (PRT) are as follows. The PRT is responsible for providing policy direction to the WT and will be engaged regularly throughout the process. The WT provides the first draft of revised IMC 2800 to the PRT for review and comment before initiating TI 2800/033 on April 1, 2002. Interim approvals are not required on subsequent draft revisions of IMC 2800, TIs already in effect, or the IPs. At the end of the schedule, the WT will submit final versions of the revised products for the PRT’s approval that will be substituted for the Office concurrence process.

The work products will be coordinated with the Implementation Plan for NMP Pilot Projects.

This organization and operation will accomplish the objectives set forth above within the expedited schedule indicated below. WT business will be conducted by teleconference and email. Several week-long meetings will be held at NRC in Rockville, MD. Following are the members of the WT and PRT. As duties and needs arise, the inherent authority of substitutes for the WT and PRT members will be recognized for a member who finds it necessary to be absent from their assignment.

Writing Team		Pink/Red Team	
NMSS	Thomas Young (pilot project Chair and Team Leader) , Anita Turner, Jim Smith	NMSS	Thomas Essig
Region I	John McGrath	RI	Christiana Lui
Region II	John Pelchat	RIII	George Pangburn
Region III	Jamnes Cameron	RIV	Gary Shear
Region IV	Michael Fuller	STP	Elmo Collins
STP	Richard Blanton	OGC	Josie Piccone
OAS/CRCPD	Robert Gallagher (Massachusetts)	OAS/CRCPD	James Peterson
		(South Carolina) amended 6/19/03	

Schedule

February 6, 2002	WT Teleconference, NMSS explains tasks and initial assignments to the appointed members
February 25 - 28, 2002	WT, 1 st draft (revised IMC 2800 and TI 2800/033) for PRT
February 28, 2002	PRT approves WT Charter
March 1, 2002	WT provides 1 st draft to PRT
March 6 - 22, 2002	WT revises TI 2800/033
March 25 - 29, 2002	WT finalize TI 2800/033 and develop training and implementation plans for TI 2800/033 roll out
***March 31, 2002	WT issues TI 2800/033
April 1 - 14, 2002	WT, Regional training and implementation for TI 2800/033
April 15, 2002 - June 30, 2003	Pilot use of the TI 2800/033 and collection of data
July 2002	WT 1 st draft of the revised IPs
October 1, 2002	Implementation of IPs
October 2002	Mid-pilot evaluation of data (April - September, 2002)
November 2002	WT develop training for revised IPs
January 2003	WT provides Regional training for revised IPs
January 15, 2003	Amended Charter to STP for NMP, ***After this date, the project was coordinated with the National Materials Program–Pilot Projects as Pilot No. 5 (SRM-SECY-02-0107/02-0074/01–0112, August 20, 2002)
March 28, 2003	Work Product Plan to STP for NMP
March 31, 2003	Work Products posted in STP, NMP Web Page
July - August 2003	WT final analysis, lessons learned report, final versions

September 2003
October 2003
February 2, 2004

PRT approves lessons learned report and final versions
Final versions of IMC 2800 and IPs are effective
Final versions and lessons learned report to STP for NMP

Estimated Resources

Each WT member will contribute a total resource of 0.1 FTE in FY03.