Office of Nuclear Material Safety and Safeguards State Procedure Approval

Reviewing the Common Performance Indicator, Technical Quality of Inspections - SA-102

Issue Date:

Review Date:

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NOTE
Any changes to the procedure will be the responsibility of the Procedure Contact. Copies of procedures will be available through the NRC Web site.

I. INTRODUCTION

This document describes the procedure for conducting reviews of U.S. Nuclear Regulatory Commission (NRC) and Agreement State radioactive materials programs using the common performance indicator, Technical Quality of Inspections [NRC Management Directive (MD) 5.6, *Integrated Materials Performance Evaluation Program (IMPEP)*].

II. OBJECTIVES

A. To verify that State and NRC inspections of licensed activities focus on health and safety and security issues in accordance with NRC Inspection Manual Chapter (IMC) 2800, *Materials Inspection Program*.

B. To verify that State and NRC inspection findings are well-founded and well-documented in inspection reports and lead to appropriate and prompt regulatory action.

C. To verify that State and NRC inspections are complete and that inspection records and findings are reviewed promptly by supervisors or management.

D. To confirm that procedures are in place and are used to help identify root causes of identified findings and poor licensee performance.

E. To confirm that inspections address performance issues previously identified in inspection reports and/or previously issued.

F. To confirm that supervisors conduct accompaniments of each inspector annually to evaluate the inspector's performance; and to assess whether the methods utilized for conducting supervisory accompaniments are effective in identifying performance issues.

G. To verify that processes or procedures are established and followed to capture and address inspection-related findings that indicate the need to modify, correct, or amend licenses.

H. For Agreement States, to determine that inspection policies and guidance are consistent with NRC guidance, and are being implemented by the program.

I. To verify that applicable licensees have implemented 'Increased Controls' in the NRC and Agreement State programs and are being inspected accordingly.

III. BACKGROUND

This performance indicator is a companion to the common performance indicator, Status of Materials Inspection Program, and is meant to elicit information about the quality of inspections. IMPEP review team members will accompany a sample of State inspectors doing different types of licensed activities to directly evaluate the performance of the inspectors. IMPEP review team members will also conduct in-depth, on-site reviews of a representative sample of completed inspection files. These reviews will focus on the scope, completeness, and technical accuracy of completed inspections and related documentation.

IV. ROLES AND RESPONSIBILITIES

A. Team Leader:

Assigns one team member as the principal reviewer for this performance indicator. Assigns one or more team members to perform the inspector accompaniments.

B. Principal Reviewer:

1. Meets the appropriate requirements, as specified in MD 5.10, *Formal Qualifications for Integrated Materials Performance Evaluation Program (IMPEP) Team Members*.

2. Reviews and evaluates selected inspection casework files, conducts staff discussions, and maintains a reference summary document of all inspection casework reviewed.

3. Conducts inspector accompaniments (unless they are conducted by an alternate team member), and maintains a reference summary document related to the accompaniments. Depending on the size of the program being reviewed, it may be necessary to schedule inspector accompaniments significantly in advance of the on-site portion of the IMPEP review (See section V. B.3 below.).

4. Informs the Team Leader of the Team's findings throughout the onsite review.

5. Completes their portion of the IMPEP written report for the performance indicator(s) reviewed.

6. Participates in IMPEP Management Review Board meeting for the review and discusses his or her findings, (this can be done either in person or via teleconference).

V. GUIDANCE

A. Scope

1. This procedure applies to the review of the technical quality of completed radioactive materials inspection actions performed by the NRC or Agreement State in the period since the last review. The principal reviewer for this indicator may find it necessary to perform a limited review of earlier inspection actions to ensure that, for example: recommendations identified during a previous IMPEP review have been addressed; findings from previous inspections have been addressed during inspections performed in the review period; or to verify that inspections conducted during the review period were performed in a timely manner.

2. This procedure specifically excludes State and NRC inspections of licensees that are not authorized for the possession, use, or storage of byproduct material, as defined in 10 CFR 20.1003.

B. Evaluation Procedures

1. The principal reviewer should refer to Part III, *Evaluation Criteria*, of MD 5.6 for specific evaluation criteria.

2. Depending on the size of the NRC or Agreement State radioactive materials program under review, the principal reviewer should select a representative number of inspection casework examples for review, concentrating on inspections of Priority 1, 2, and 3 licenses and initial inspections.

   The principal reviewer should select a risk-informed sample of the program's inspection casework for review, based upon safety and security significance of the licensed activity. The use of risk-informed sampling, rather than random sampling, maximizes the effectiveness of the review of inspection casework files. By focusing on safety and security significant inspection activities, the reviewer has a greater probability of identifying programmatic weaknesses that would have the greatest impact on public health and safety and security of licensed materials. The guidance below can be used to assist in selecting a representative risk-informed inspection casework sample. Additional guidance on the number of casework files expected to be reviewed can be provided by the Team Leader.

   a. All completed materials inspections conducted by the NRC or Agreement State since its last performance review are candidates for evaluation.

b. Inspection casework should be selected to represent a cross-section of licensed activities, including medical, industrial, and academic uses. Casework selected for review should focus on higher risk significant activities, such as medical activities requiring written directives, emerging technologies, panoramic and underwater irradiators, industrial radiography, radiopharmacy, isotope production, manufacturers/distributors, and other appropriate activities.

c. Inspection priorities should be reviewed against NRC inspection priorities. Differences in the program's inspection priorities from NRC priorities should be brought to the attention of the Team Leader

d. Inspection casework review should represent a cross section of the program's inspectors rather than just reviewing several files from one inspector and omitting the review of files from other inspectors that performed inspections during the review period.

e. Inspection casework files selected for review should include a representative sample of inspections of licensees implementing security requirements for Category 1 and Category 2 Risk Significant Radioactive Material.

f. Reciprocity inspections, temporary job site inspections, inspections related to license termination, bankruptcy, and decommissioning activities should be included for review, as appropriate.

3. The principal IMPEP reviewer or other assigned team member should coordinate with the program prior to the onsite review to perform accompaniments of the NRC or Agreement State's inspectors.

IMPEP inspector accompaniments are performance-based evaluations of inspector effectiveness.

Depending on the size of the NRC or Agreement State radioactive materials program under review, an appropriate number of accompaniments should be performed to observe the inspectors' performance and demonstration of proper inspection techniques. Similar to the inspection casework review, based upon safety and security significance of the licensed activity, the reviewer should select a risk-informed sample of the program's pending inspection activities to be observed. The use of a risk-informed approach to selecting inspections for accompaniments, rather than randomly picking inspections from a pending inspection list maximizes the effectiveness of the inspector accompaniments. By focusing on safety and security significant inspections, the reviewer has a greater probability of

identifying programmatic weaknesses that would have the greatest impact on public health and safety and security of licensed materials. The guidance below can be used to assist in selecting the number of inspectors to be accompanied, which inspectors to accompany, and which types of licensed activities to accompany inspectors on inspections. Additional guidance on selecting a representative sample of accompaniments can be provided by the Team Leader.

Also, depending on the size of the radioactive materials program being reviewed, it may be necessary to schedule inspector accompaniments significantly in advance of the on-site portion of the IMPEP review. For example, risk-significant/complex licensees are inspected every 1-2 years. So for a small materials program, with fewer risk-significant licensees, it may be necessary to conduct accompaniments up to a year in advance of the on-site IMPEP to ensure inspection accompaniments of such licensees.

a. All NRC or Agreement State materials inspectors are candidates for inspector accompaniments.

b. Accompaniments should be performed prior to the on-site portion of the IMPEP review and sufficiently in advance to allow for the conduct of additional accompaniments prior to the review, if necessary.

c. The reviewer should ensure that the scheduling of inspector accompaniments does not cause any inspection to become overdue.

d. For efficiency, inspections that typically take one work day to perform are preferable for accompaniments. These types of inspections allow the reviewer to observe the entire inspection process from beginning to end and also allow for the reviewer to maximize efficiency and conduct additional accompaniments during the week. However, inspections of complex licensees may take longer than one day and are acceptable candidates for inspector accompaniments.

e. The number of inspector accompaniments to be performed is dependent on a variety of factors, including the results of previous reviews, as well as the size of the program being reviewed. In most cases, the goal is to accompany one-half of the program's inspectors. For a program with few inspectors (5 or less), consideration should be given to accompanying all of the inspectors.

f. Newly qualified inspectors and inspectors that were not accompanied during the previous review should be strongly considered when selecting inspectors to accompany.

g. An important consideration when performing inspector accompaniments is also the type of licensed activity being inspected. Inspection activities should be selected to represent a cross-section of licensed activities and focus on higher risk-significance activities. For smaller materials programs, to ensure that higher risk-significant licensees are included, it may be necessary to schedule inspector accompaniments significantly in advance of the on-site portion of the IMPEP review (See section V. B.3 above.).

h. Of the licensed activities selected, a representative sample should include licensees implementing security requirements for Category 1 and Category 2 Risk Significant Radioactive Material.

i. If possible, consideration should be given to observing inspectors in different settings, including at temporary job sites or other field locations.

4. If the inspector accompaniments indicate a potential weakness on the part of one inspector or with respect to inspections of certain types of licensed activities, the Team Leader should assess whether additional accompaniment inspections are necessary and discuss this matter with the NRC or Agreement State Program Office management.

   If the initial review of the inspection casework files indicates a potential weakness on the part of one inspector or problems with respect to inspections of certain types of licensed activities, additional similar inspection files for the inspector or related to the licensed activity should be reviewed.

   If either the accompaniments or inspection case files reveal weaknesses, the reviewer(s) should attempt to determine whether the issue is isolated or represents a programmatic weakness. The reviewer(s) should attempt to determine the root cause(s) of any identified weaknesses.

5. If the inspector accompaniments from the previous review indicated a weakness in a particular area/modality, consideration should be given to performing an increased number of inspector accompaniments involving that area/modality. If inspection casework files from the previous review indicated a programmatic weakness in a particular area/modality, consideration should be given to reviewing additional casework in that area/modality to assure that the weakness has been addressed.

C. Review Guidelines

1. Prior to the on-site review, the reviewer(s) should review:

   a. The response generated by the NRC or Agreement State radioactive materials program to relevant questions in the IMPEP questionnaire. Depending on the level of detail of the information provided, the response to the questionnaire relative to this indicator may be useful to focus the review.

   b. For the NRC and the Agreement States that use it, it may be possible to use the Web Based Licensing (WBL) system to generate reports of inspections that were completed during the review period. This information may be useful to help select inspection casework files. Information from WBL may also be used to provide a list of upcoming or pending inspections, which may be used to help focus inspector accompaniment selections. The principal reviewer should coordinate with the Team Leader to obtain and review the relevant information from WBL.

2. Prior to the inspector accompaniments, the assigned reviewer(s) should:

   a. Gather the information from the NRC or Agreement State program necessary to select the inspectors to be accompanied and licensed activities to be inspected and discuss with the NRC or Agreement State program managers.
   b. Coordinate with the program's inspector(s) to be accompanied as to the logistics of the accompaniment, such as when and where to meet. Information should be gathered as to any specific security requirements, attire, or personal protective equipment that may be required for access to the licensed facilities being inspected (e.g. safety shoes, safety glasses).
   c. Discuss with the inspector the extent of the reviewer's role in the inspection. It is not the role of the reviewer to help with the inspection effort or participate in the inspection, but rather to observe the inspector(s) performance during the conduct of the inspection. Observation of the inspector may include discreetly interacting with or asking questions of the inspector.
   d. Discuss with the inspector the way the reviewer's presence will be explained to the licensee. The inspector or the reviewer should discuss and decide who will introduce the reviewer and explain the extent of the reviewer's role.
   e. Discuss with the program's inspector the methods that will be used in evaluating the inspector's performance and how feedback will be provided to the inspector and his or her management

D. Review Details

The principal reviewer should evaluate the following:

1. For Agreement States, determine that inspection policies, procedures, and guidance are in place and are consistent with NRC guidance. For NRC and Agreement State programs, inspectors should have familiarity with the inspection policies, procedures, and guidance. These should include procedures to help identify root causes and other causal factors related to identified findings and poor licensee performance. The review of inspection casework files as well as the inspector accompaniments should demonstrate consistent implementation of the established inspection program.

2. Completeness of the inspection files. The reviewer should ensure that all relevant documents, letters, file notes, email correspondence, and telephone conversations related to the inspections are complete and in the file or are otherwise easily retrievable;

3. Detail of inspection records. For each inspection casework file selected, the reviewer should evaluate that the file adequately documents or contains (as appropriate):

    a. Sufficient detail to demonstrate that each inspection was adequate to assess the health and safety and security of licensed activities;
    b. A description of the scope of each inspection such that a future inspector will understand which items or aspects of the licensed activities were reviewed, and which were not and may warrant review during future inspections;
    c. Sufficient information to substantiate any identified violations or non-compliances; that regulatory actions issued to licensees are appropriate for the safety and/or security significance of the identified violations; and that violations are clearly communicated to licensees and dispatched in a timely manner;
    d. Any violations and/or unresolved items identified during previous inspections were appropriately addressed by the licensee;
    e. Program management review of inspection reports has been sufficient to ensure that management identified deficiencies (e.g., unsupported conclusions and opinions in the report, violations not properly substantiated, and apparent violations not cited) and has brought these deficiencies to the attention of the inspector for resolution;
    f. Review of licensee responses to identified findings or violations has been evaluated by the program for adequacy and that any subsequent follow-up actions taken by the program were appropriate;
    g. Instrumentation used by inspectors for independent or confirmatory

measurements was calibrated at appropriate intervals and was appropriate for the types of licensed activities that were inspected; and,

h. Licensee activities observed by the inspector(s), including activities at temporary job sites, field stations, or satellite facilities, were appropriately described.

4. Evaluation of inspector performance during accompaniments. For each inspector accompanied, the reviewer should evaluate the inspector's performance:

   a. Inspections should be of sufficient scope to determine whether the health and safety and security of licensed activities were adequately addressed.
   b. Inspectors should gather sufficient information to substantiate any identified violations or non-compliances; inspection findings and expectations regarding corrective actions should be clearly communicated at the conclusion of the inspection;
   c. Any violations and/or unresolved items identified during previous related inspections should be reviewed during the inspection to assure that they were appropriately addressed by the licensee;
   d. Inspectors should use appropriate and calibrated instrumentation for performing independent and/or confirmatory measurements for the type of licensed activity inspected; Inspectors should utilize proper techniques when using instrumentation;
   e. Inspectors should observe licensee activities including activities at temporary job sites, field stations, or satellite facilities, and ensure the activities observed are appropriately described; and,
   f. Inspectors should demonstrate proper evaluation of radiation safety conditions as well as the security of licensed materials.

5. Licensing actions may be necessary as a result of inspection activities. Verify that processes or procedures have been established by the NRC or State to capture inspection-related findings that indicate the need to modify, correct, or amend licenses. If the program has identified any such inspection-related findings, confirm independently that those actions have been completed as necessary. For programs with separate inspection and licensing staff, determine how State and NRC inspection-related matters are communicated to licensing staff and how licensing actions are initiated and completed as necessary.

6. The reviewer should verify that the NRC or Agreement State supervisors accompany all inspectors on at least one inspection per year to evaluate the inspector's performance. Assess whether the methods utilized for conducting supervisory accompaniments are effective in identifying performance issues that need to be corrected. Confirm that the program supervisor who

accompanies inspectors to evaluate their performance is experienced for the types of inspection on which they are accompanying their inspectors (See Appendix C, Question 3.).

E. Review Information Summary

1. At a minimum, the inspection casework summary reviewed by the principal IMPEP reviewer will include:

   a. Licensee name;
   b. License number;
   c. Location(s) inspected (city, state);
   d. Inspection priority (For consistency, the reviewer should document the appropriate NRC inspection priority. Differences in inspection priorities should be brought to the attention of the Team Leader);
   e. Description of licensed activity
   f. Inspector(s) initials;
   g. Type of inspection (e.g., routine/initial/special/reciprocity; announced/unannounced; office/temporary job site);
   h. Date(s) of inspection;
   i. Date inspection findings were issued; and,
   j. Reviewer's comments related to identified performance issues.

2. Appendix A, Inspection Casework Review Summary Sheet, provides a template for recording the necessary information that should be maintained by the principal reviewer. The reviewer is not required to use Appendix A, but may find it to be a useful tool for recording the necessary information.

3. At a minimum, the information maintained by the assigned reviewer for the accompaniments of inspectors will include:

   a. The initials of the inspector accompanied;
   b. Licensee name;
   c. License number;
   d. Location(s) inspected (city, state);
   e. Inspection priority (For consistency, the reviewer should document the appropriate NRC inspection priority. Differences in inspection priorities should be brought to the attention of the Team Leader);
   f. Description of licensed activity inspected
   g. Type of inspection (e.g., routine/initial/special/reciprocity; announced/unannounced; office/temporary job site);
   h. Date(s) of inspection; and
   i. Reviewer's comments related to observed performance issues and discussed with the inspector.

4. Appendix B, Inspector Accompaniment Summary Sheet, was developed to assist the reviewer in performing and documenting the inspector accompaniments. The reviewer is not required to use Appendix B, but may find it to be a useful tool.

5. Not all the information maintained in the reviewer's summary of the inspection casework files reviewed or inspection accompaniments performed will be included in the IMPEP report. The Team Leader can provide guidance as to what information is necessary to include in the report. Any information that is included in the IMPEP report must be factual, should be concise, and should concentrate on identified or observed performance deficiencies and their root cause(s).

F. Discussion of Findings with NRC or Agreement State

The reviewer should follow the guidance provided in Procedure SA-100, *Implementation of the Integrated Materials Performance Evaluation Program (IMPEP),* regarding discussions related to this indicator with inspectors, supervisors, and managers.

VI. APPENDIXES

A. Inspection Casework Review Summary Sheet
B. Inspector Accompaniment Guidance
C. Frequently Asked Questions

VII. REFERENCES

1. NRC Management Directive 5.6, *Integrated Materials Performance Evaluation Program (IMPEP).*
2. NRC Management Directive 5.10, *Formal Qualifications for Integrated Materials Performance Evaluation Program (IMPEP) Team Members.*
3. NRC Inspection Manual Chapter 2800, *Materials Inspection Program*.
4. FSME Procedure SA-100, *Implementation of the Integrated Materials Performance Evaluation Program (IMPEP).*

VIII. ADAMS REFERENCE DOCUMENTS

For knowledge management purposes, listed below are all previous revisions of this procedure, as well as associated correspondence with stakeholders, that have been entered into the NRC's Agencywide Document Access Management System (ADAMS).

No.	Date	Document Title/Description	Accession Number
1	6/28/04	STP-04-045, Opportunity to Comment on Draft Revisions to STP Procedure SA-102	ML041800434
2	3/28/05	Summary of Comments on SA-102	ML052250018
3	4/12/05	STP-05-030, Final STP Procedure SA-102	ML051080398
4	4/12/05	STP Procedure SA-102	ML052250016
5	5/17/07	FSME-07-048, Opportunity to Comment on Draft Revision to FSME Procedure SA-102	ML071400011
6	6/25/07	FSME Procedure SA-102, Resolution of Comments	ML072160007
7	7/23/07	FSME Procedure SA-102	ML072160005

APPENDIX A
INSPECTION CASEWORK REVIEW SUMMARY SHEET

A/S OR NRC: _____ REVIEWER: _____ CASEWORK FILE NO.: _____

GENERAL INFORMATION:			
LICENSEE:		LICENSE #:	
LICENSE TYPE:		PRIORITY:	
LOCATION(S) INSPECTED:			
INSPECTION DATE(S):		INSPECTOR(S):	
ADDITIONAL INFORMATION:			
INSPECTION TYPE:			
☐ UNNANOUNCED		☐ ANNOUNCED	
☐ ROUTINE	☐ INITIAL	☐ SPECIAL	☐ RECIPROCITY
☐ OFFICE		☐ TEMPORARY JOB SITE	
DATE OF PREVIOUS INSPECTION or DATE OF LICENSE ISSUANCE FOR INITIAL INSPECTIONS:			
FOR ROUTINE INSPECTIONS: CONDUCTED WITHIN 25% OF INSPECTION FREQUENCY?			Y N
FOR INITIAL INSPECTIONS: CONDUCTED WITHIN 1 YEAR OF LICENSE ISSUANCE?			Y N
SUPERVISORY REVIEW OF INSPECTION FINDINGS BY:		DATE:	
DATE INSPECTION FINDINGS ISSUED:		WITHIN 30 DAYS OF INSPECTION? Y N	

PERFORMANCE COMMENTS	
COMMENTS DISCUSSED WITH:	DATE:

APPENDIX B

INSPECTOR ACCOMPANIMENT SUMMARY SHEET

A/S OR OFFICE: _____ REVIEWER: _____ ACCOMPANIMENT NO.: _____

	PRELIMINARY DISCUSSION WITH INSPECTOR	DONE
1.	EXPLAIN THE REVIEWER'S ROLE IN THE INSPECTION	☐
2.	DISCUSS PROCEDURE FOR INTRODUCING REVIEWER TO LICENSEE AND EXPLAINING HIS/HER ROLE IN INSPECTION	☐
3.	EXPLAIN METHODS TO BE USED IN EVALUATING INSPECTOR'S PERFORMANCE AND PROVIDING FEEDBACK	☐

GENERAL INFORMATION:			
LICENSEE:		LICENSE #:	
LICENSE TYPE:		PRIORITY:	
LOCATION(S) INSPECTED:			
INSPECTION DATE(S):		INSPECTOR:	
ADDITIONAL INFORMATION:			
INSPECTION TYPE:			
☐ UNNANOUNCED		☐ ANNOUNCED	
☐ ROUTINE	☐ INITIAL	☐ SPECIAL	☐ RECIPROCITY
☐ OFFICE		☐ TEMPORARY JOB SITE	

	PERFORMANCE COMMENTS

ITEM	OK or N/A	COMMENTS
INSPECTOR'S PREPARATION		
ADEQUATE REVIEW OF LICENSE AND COMPLIANCE HISTORY		
INSPECTION PROCEDURE, GUIDANCE, PLAN OR FIELD FORM		
APPROPRIATE RADIATION DETECTION AND MEASUREMENT INSTRUMENTS FOR ACTIVITIES INSPECTED ☐ CALIBRATED ☐ INSTRUMENT RESPONSE CHECK, IF APPROPRIATE		
SUPPLEMENTAL MATERIALS: ☐ IDENTIFICATION ☐ REGULATIONS ☐ FORMS DOSIMETRY		
OPENING		
ENTRANCE BRIEFING CONDUCTED AT APPROPRIATE LEVEL		
EXPLANATION OF INSPECTION PURPOSE, SCOPE, METHOD		
INSPECTION		
USE OF APPROPRIATE INSPECTION FORM OR		

CHECKLIST		
"WALK THROUGH" AT BEGINNING OF INSPECTION		
OBSERVATION OF LICENSSEE PERFORMANCE, LICENSEE OPERATIONS, LICENSED ACTIVITIES IN PROGRESS		
INDEPENDENT AND/OR CONFIRMATORY MEASUREMENTS PERFORMED		
FACILITIES CHECKED FOR PROPER POSTING, MATERIALS CHECKED FOR PROPER LABELIING		
SECURITY VERIFIED ☐ SECURITY OF LESS THAN CATEGORY 2 ☐ SECURITY OF CATEGORY 2 OR HIGHER ○ VERIFICATION OF NSTS ○ BACKGROUND INVESTIGATIONS, ACCESS AUTHORIZATION, TRUSTWORTHINESS & RELIABILITY ○ PHYSICAL PROTECTION OF MATERIALS IN USE ○ PHYSICAL PROTECTION OF MATERIALS IN TRANSIT ○ REVIEW OF SELECTED RECORDS RELATED TO SECURITY REQUIREMENTS		
WORKERS CHECKED FOR PERSONAL DOSIMETRY		
INTERVIEWS AND DISCUSSIONS CONDUCTED WITH: ☐ RAM USERS		

☐ ANCILLARY WORKERS		
VERIFICATION OF SHIELDING OF MATERIALS		
ADHERENCE TO ALARA EVALUATED		
INSPECTION CONDUCTED IN SUFFICIENT SCOPE & DEPTH		
VERIFICATION OF CORRECTIONS TO: ☐ PREVIOUS VIOLATIONS ☐ OPEN OR UNRESOLVED ITEMS		
REVIEW OF MANAGEMENT OVERSIGHT OF LICENSED ACTIVITIES		
REVIEW OF INCIDENTS, MEDICAL EVENTS, EQUIPMENT FAILURES, OVEREXPOSURES, ETC.		
ITEM	**O.K.**	**COMMENTS OR QUESTIONS**
REPRESENTATIVE SAMPLE OF SELECTED RECORDS VERIFIED AGAINST ORAL STATEMENTS AND OBSERVATIONS, AS APPROPRIATE, FOR: ☐ PROCUREMENT & INVENTORY ☐ RECEIPT & TRANSFER OF MATERIAL ☐ INTERNAL AUDITS ☐ SURVEYS & MONITORING ☐ PERSONNEL DOSIMETRY, BIOASSAY ☐ QUALIFICATION AND TRAINING OF PERSONNEL ☐ OPERATING & EMERGENCY PROCEDURES ☐ RADIATION SAFETY COMMITTEE ☐ AUTHORIZED USERS ☐ INSTRUMENT CALIBRATION ☐ UTILIZATION LOGS		

☐ LEAK TESTS ☐ WRITTEN DIRECTIVES ☐ TRANSPORTATION OF MATERIALS ☐ WASTE MANAGEMENT, DISPOSAL ☐ RELEASE OF AIR & SEWER EFFLUENTS ☐ EQUIPMENT & MAINTENANCE		
INSPECTOR'S PROFESSIONALISM		
USE OF PROPER HEALTH PHYSICS TECHNIQUES (SELF MONITORING, ETC.)		
ACCURATE EVALUATION OF RADIATION SAFETY		
KNOWLEDGE OF HEALTH PHYSICS & REGULATIONS		
APPROPRIATE APPEARANCE FOR LICENSE TYPE, INCLUDING PROPER USE OF PPE AND SAFETY EQUIPMENT AS APPROPRIATE		
SKILL IN WORDING QUESTIONS		
SUITABLE RAPPORT WITH MANAGEMENT AND WORKERS		
CLOSING		
PREPARATION FOR EXIT MEETING; ASSEMBLY OF SUPPORTING MATERIAL		
EXIT CONDUCTED AT APPROPRIATE MANAGEMENT LEVEL		
VIOLATIONS FULLY EXPLAINED; LICENSE CONDITION OR REGULATION CITED		
RECOMMENDATIONS CLEARLY DISTINGUISHED FROM VIOLATIONS		
IMPENDING ENFORCEMENT ACTIONS EXPLAINED		
LICENSEE ADVISED OF EXPECTED RESPONSE AND NEED FOR CORRECTIVE ACTIONS		

SUMMARY OF EVALUATION			
1.	INSPECTOR'S PERFORMANCE	☐ SATISFACTORY	☐ NEEDS IMPROVEMENT
2.	PERFORMANCE COMMENTS AND SPECIFIC AREAS OF IMPROVEMENT:		
3.	THE INSPECTOR MIGHT BENEFIT FROM ADDITIONAL TRAINING IN: (SPECIFY TYPE OF TRAINING: e.g. Formal Course, Mentoring, On-The-Job, etc.)		
4.	EVALUATION DISCUSSED WITH INSPECTOR ON:		
5.	EVALUATION DISCUSSED WITH SUPERVISOR/MANAGEMENT ON:		

Appendix C

Frequently Asked Questions

Q1: How often should an inspector be accompanied by his or her supervisor?

A1: Inspectors should be accompanied by their supervisor at least annually. U.S. Nuclear Regulatory Commission's (NRC) Inspection Manual Chapter 2800, *Materials Inspection Program* notes that the performance of each inspector be evaluated during actual inspections at least once during each fiscal year. Agreement States can perform them annually rather than by fiscal year. In the event that an inspector is not accompanied by his/her supervisor annually, it should be documented by the supervisor. The documentation should include an explanation and a proposed schedule for performing the accompaniment.

Q2: What if an inspector only performs inspections infrequently or just a few times per year?

A2: Even if the inspector only performs occasional inspections, the inspector should still be accompanied by his or her supervisor annually during those years when the inspector performed inspections.

Q3: Should the supervisor who performs the accompaniments be a qualified inspector?

A3: It is not required that the supervisor who performs accompaniments be a qualified inspector. However, supervisors that perform accompaniments should be strongly familiar with the program's inspection practices and procedures. The supervisor should also be familiar with the type of licensed activity and specific requirements related to the type of licensed activity being inspected during the accompaniment. A supervisor that may not be familiar with inspections of licensed materials may have inspection experience from other program areas and can apply that experience to the accompaniment evaluation. Familiarity with the program's practices and procedures, the licensed activities inspected, and proper inspection techniques will enable the supervisor to provide more constructive feedback regarding the inspector's performance.

Q4: In Agreement States, can senior staff conduct inspector accompaniments rather than the supervisor?

A4: It is expected that supervisors generally conduct the accompaniments; however, for Agreement States, it is acceptable for senior program staff to perform inspector accompaniments when necessary and justified. For example, in an Agreement State where there is a vacancy in a supervisory position, the accompaniments may be performed by qualified, experienced senior staff during the time the vacancy is unfilled rather than not perform accompaniments at all due to the vacancy.

Q5: What should the reviewer do if during the accompaniment it is discovered that the inspector has not been qualified to perform that particular type of inspection?

A5: The team member(s) performing inspector accompaniments should coordinate with the NRC or Agreement State prior to the conduct of the inspector accompaniments to assure that the inspectors selected for accompaniments are qualified to inspect the types of licensed activities being observed during the inspections. If an inspector is not fully qualified for all inspection types, but according to the program, is qualified for inspections of certain types of licensed activities, the reviewer can observe the inspector perform inspections of the types of licensed activities that the inspector is qualified to inspect. For example, if an inspector is qualified to inspect radiography licensees and well logging licensees only, they should be observed on these types of inspections, and not other types of inspections.

Q6: If all of the inspectors were accompanied during the last IMPEP review, does the review team need to conduct any accompaniments during the current review?

A6: Yes, even if all the program's inspectors were accompanied during the last IMPEP review, the review team should still conduct inspector accompaniments. The review team member(s) responsible for performing the accompaniments must still ensure that the technical quality of inspections and the technical competency and performance of the inspectors for the review period. In this case, consideration should be given to performing accompaniments of the inspectors for different types of licensed activities than were accompanied during the previous review. For example, if an inspector was accompanied on a medical inspection during the previous review, the inspector can be accompanied on an industrial inspection during the current review. As noted in the answer to Q5, the reviewer should assure that the inspector is qualified to inspect the types of licensed activities to be inspected.

Q7: What if the Agreement State's inspection policy is to perform compliance-based inspections rather than performance-based inspections?

A7: Agreement States are encouraged, but not required, to conduct performance-based inspections. It is encouraged that inspections strike a balance between performance observations of licensee activities with a review of selected licensee records to verify compliance. Each Agreement State's policies and procedures for the conduct of inspections will be examined during the review. Review teams will conduct reviews in a manner that is consistent with current IMPEP guidance applicable to this indicator and the inspection policy of the State.

Q8: If an Agreement State supervisor performs inspections, should the supervisor also be accompanied annually and by whom?

A8: Inspectors should be accompanied by their supervisor at least annually. Therefore, supervisors who perform inspections should also be accompanied annually. In

Agreement States, sometimes Program Directors perform inspections and it is not practical to have the Program Director's supervisor perform an accompaniment. During previous IMPEP reviews, NRC has found it acceptable for a senior or more experienced inspector to accompany a supervisor that performs inspections. However, in some cases, State labor or personnel practices would prohibit or discourage this approach. Because every possible scenario cannot be described here, Agreement States that have supervisors that perform inspections should develop and implement a policy that describes its approach to performing and documenting accompaniments of supervisors.

Q9: What if there are concerns regarding an inspector's performance during an inspector accompaniment?

A9: Under no circumstance should a team member conducting an inspector accompaniment allow an item that is of immediate health and safety or security concern to continue to be unidentified during an inspection. If this occurs, it is the responsibility of the reviewer to bring the concerns to the attention of the inspector during the inspection and inform the inspector's supervisor as well as the Team Leader as soon as is practicable. If the concerns are not of immediate health and safety or security significance, or are of unknown health and safety or security significance, the reviewer should allow the accompaniment to continue, but document the concerns in the accompaniment report and discuss the issues with the inspector at the conclusion of the inspection, and subsequently (e.g. end of the day, end of the week, or the following week) with the inspector's supervisor as well as the Team Leader. In all cases, after the inspector has concluded the onsite inspection, the review team member should take a few moments with the inspector and discuss any observed or identified performance issues with the inspector. This will allow for meaningful dialogue between the review team member and the inspector to clarify any issues prior to the review team member briefing the inspector's supervisor and/or program management.