NMSS~~FSME~~ Procedure Approval

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

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NOTE

~~These procedures were formerly issued by the Office of State and Tribal Programs (STP).~~ Any changes to the procedure will be the responsibility of the ~~FSME~~ Procedure Contact ~~as of October 1, 2006~~. Copies of ~~FSME~~ NMSS procedures will be available through the

NRC website.

I. INTRODUCTION

This document describes the procedure for conducting reviews of U.S. Nuclear Regulatory Commission (NRC) Regional 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 ensure verify that 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 ensure verify that inspection findings are well-founded and well-documented in inspection reports and lead to appropriate and prompt regulatory action.

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

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

E. To confirm that followup inspections address previously identified open items and/or previously issuedpast violations.

F. To verify that inspection findings lead to appropriate and prompt regulatory action.

G. To confirm that supervisors conduct annual accompaniments of each inspector annually to evaluateof the inspector's performance; and to assess whether the methods utilized for conducting supervisory accompaniments are effective in identifying performance issues. each inspector to assess performance and assure application of appropriate and consistent policies and guides.

GH. For programs with separate licensing and inspection staffs, tTo verify that processes or procedures are established and followed to capture and address provide inspection-related findings that indicate the need to modify, correct, or amend licensesfeedback information to license reviewers.

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H~~I~~. For Agreement States, to determine that inspection ~~guides~~ policies and guidance are consistent with NRC guidance and that they are being ~~used consistently by inspectors to assure uniform and complete inspection practices~~implemented by the program.

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

~~J. To determine the status of complex decommissioning sites fomerly managed by the NRC under the Site Decommissioning Management Plan (SDMP) and transferred to States whose Agreements became effective after August 26, 1999.~~

III. BACKGROUND

This performance indicator provides a qualitative balance to the common performance indicator, Status of Materials Inspection Program, which looks at the status of an inspection program on a quantitative basis. Review team members will accompany a sample of inspectors at different types of licensed ~~facilities~~ activities to evaluate the ~~knowledge and capabilities~~performance of inspectors firsthand. Review team members will also conduct in-depth, on-site reviews of a ~~cross-section~~representative sample of completed inspection files~~reports~~. These reviews will focus on the scope, completeness, and technical accuracy of completed inspections and related documentation.

IV. ROLES AND RESPONSIBILITIES

A. Team Leader:

Determines which team member~~(s)~~ is assigned as the principal reviewer for this performance indicator. Determines which team member(s) will 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. 2. Reviews and evaluates selected inspection casework files, conducts staff discussions, and maintains a reference summary of all inspection casework reviewed.

3. Conducts inspector accompaniments (unless they are conducted by an alternate team member), and maintains a reference summary related to the accompaniments.

4. Informs the Team Leader of their findings throughout the review.

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

6. Attends the IMPEP Management Review Board meeting for the review and is prepared to discuss their findings, if necessary (this can be done either in person or via teleconference).

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

V. GUIDANCE

A. Scope

1. This procedure applies only to the review (for adequacy, accuracy, completeness, clarity, specificity, and consistency) of the technical quality of completed radioactive materials inspection actions performed by the NRC Region or Agreement State in the period since the last review. The principal reviewer for this indicator may, nonetheless, find it necessary to perform a limited review of earlier inspection actions to ensure that, for example: recommendations identified during outstanding items found in a previous IMPEP review of inspection casework have been addressed; findings from previous inspections have been addressed during inspections performed in the review period; or to verify if inspections conducted during the review period were performed in a timely manner.

2. This procedure specifically excludes inspections of licensees that are not authorized for the possession, use, or storage of byproduct material, as defined in 10 CFR 20.1003. Also excluded are non-Atomic Energy Act materials and inspections conducted by NRC Headquarters personnel.

B. Evaluation Procedures

1. The principal reviewer should refer to Part III, *Evaluation Criteria*, of MD 5.6 for specific evaluation criteria. ~~The definitions of the terms "Materials Inspection" and "Overdue Core Inspections" can be found in the Directive=s Glossary.~~

2. Depending on the size of the NRC Regional or Agreement State radioactive materials program under review, the principal reviewer should select a representative number of~~10-25~~ inspection casework examples for review, concentrating on inspections of ~~Priorty~~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 actions, 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 materials inspections conducted by the NRC Region 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. ~~Inspections of license terminations, bankruptcies, and decommissionings will be treated as a subset of this performance indicator.~~
   c. Inspection casework should represent a cross section of the program's inspectors rather than to review several files from one

inspector and omit the review of files from other inspectors that performed inspections during the review period. Inspection casework should be selected to represent a cross section of the program=s workload, including as many different inspectors, license categories, and geographic locations as practical. The principal reviewer should perform a risk-informed sample of the program=s inspection casework based upon safety significance. The use of risk-informed sampling, rather than Arandom@ sampling, maximizes the effectiveness of the review of casework. By focusing on safety significant inspection actions, the reviewer has a greater probability of identifying programmatic weaknesses that would have the greatest impact on public health and safety.

d. Inspection The principal reviewer should select a mix of medical and academic uses (e.g., hospitals; medical centers; brachytherapy, including high-dose rate remote afterloaders; gamma stereotactic radiosurgery units; emerging technologies; and universities) and industrial uses (e.g., industrial radiography, irradiators, and manufacturers/distributors) for review.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.

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

f. Inspections of complex decommissioning sites should be reviewed, if available, including inspections of sites formerly managed by the NRC under SDMP that were transferred to States with Agreements that became effective after August 26, 1999.

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

IMPEP inspector accompaniments are performance-based evaluations of inspector effectiveness. Depending on the size of the NRC Regional 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 during which to observe inspectors. The use of a risk-informed approach to selecting inspections to perform 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.

a. All NRC Region 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 that take longer than one day 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 review, 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 a 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.

h. Of the licensed activities selected, a representative sample should include inspections of 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 accompaniment results 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 Region or Agreement State program management.

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

In the accompaniments or inspection case files reveal weaknesses, the reviewer(s) should attempt ~~in order~~ to determine whether the issue is isolated or represents a~~the magnitude of the~~ programmatic weakness. The reviewer(s) should attempt to determine the ~~and its~~ root cause(s) of any identified weaknesses.

5~~4~~. If the inspector accompaniments from the previous review indicated a weakness in a particular area, consideration should be given to performing inspector accompaniments involving a similar type of licensed activity. If inspection casework files from the previous review~~s~~ indicated a programmatic weakness in a particular area, consideration should be given to reviewing additional casework in that area ~~should be reviewed~~ to assure that the weakness has been addressed.

~~5. If the evaluation of 10-25 casework examples does not reveal any programmatic weaknesses, no additional casework needs to be reviewed.~~

~~6. For the NRC Regions, no attempt should be made to evaluate performance on a state-by-state basis for this indicator.~~

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C. Review Guidelines

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

   a. The response generated by the NRC Region or Agreement State radioactive materials program to relevant questions in the IMPEP questionnaire. Depending on the level of detail of the information provided, Tthe response to the questionnaire relative to this indicator may be useful toshould be used to focus the review.
   b. For the NRC Regions, 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 able to provide a list of upcoming or pending inspections, which may be useful 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 Regional or Agreement State program necessary to select the inspectors to be accompanied and licensed activities to be inspected and discuss with the NRC Regional or Agreement State managers.
   4. Prior to the inspection, the reviewer and inspector shouldb. Coordinate with the 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. dDiscuss with the inspector:

   a. the extent of the reviewer'=s participationrole 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 observation, not active participation);

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~~b. 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 inspector ~~; and~~

~~c.~~ 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~~,~~.

~~tallies of completed inspections can be obtained from the License Tracking System (LTS). This information can be obtained prior to the on-site review from the Office of Federal and State Materials and Environmental Management Programs (FSME). The LTS has limited ability to sort these records, depending on the needs of the principal reviewer. Once the appropriate files are selected, a call to the Regional office can be made to have the inspection files pulled and ready for review at the time of the visit.~~

~~e. For Agreement States, inspection reports are not normally submitted to FSME. The principal reviewer should work with the IMPEP team leader in selecting the appropriate inspection files for review.~~

D. Review Details

~~To determine the technical quality of inspections, t~~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 Regional 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. ~~Inspection report documentation. For each case selected, the inspection report should adequately document (as appropriate):~~

~~a. the scope of the inspection and the licensed program;~~

~~b. the licensee=s organization and the persons contacted;~~

~~c. the licensee=s administrative controls and procedures; facilities and equipment; radiation safety procedures for procurement, use, transfer and disposal; posting and labeling; personnel monitoring; gaseous and~~

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liquid effluents; surveys and bioassay; incidents and overexposures; and radioactive waste packaging and shipping;

d. operations observed including operations at temporary job sites, field stations or satellite facilities;

e. interviews of workers;

f. independent measurements;

g. status of previous violations;

h. new violations noted;

i. the exit interview with management;

j. the substance of discussions with licensee=s management;

k. licensee=s response to any violations.

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 inspection are complete and in the file or are otherwise easily retrievable;

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

a. The reviewer should ensure that inspection reports Sufficient detail to demonstrateare sufficiently detailed to show that each inspection was adequate to address the health and safety and security of licensed operationsactivities;

b. A description of the scope of the 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;

a. 4. Substantiation of any violations and safety recommendations;

b. 5. Appropriateness of regulatory actions taken in response to violations;

c. 6. Documentation of violations. The reviewer should ensure that violations are written using appropriate regulatory language and

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dispatched in a timely manner;

d. 7. Documentation and resolution of unresolved items. The reviewer should ensure that aAny violations and/or unresolved items identified during previous inspections were pursued to a satisfactory conclusionappropriately addressed by the licensee;

e.

8. MProgram management review of inspection reports that is sufficient to. The reviewer should ensure that management identifies report deficiencies (e.g., unsupported conclusions and opinions in the report, violations not properly substantiated, and apparent violations not cited) and bring these deficiencies to the attention of the inspector for resolution;

f.

9. Review of licensees= responses . The review should ensure that licensees= responses to identified findings or violations were was evaluated by the program for adequacy and that any subsequent follow-up actions taken the programby management were appropriate;

g.

10. Instrumentation. The review should ensure that iInstrumentation used by inspectors for independent or confirmatory measurements is adequate, calibrated at appropriate intervals, and functioning properly and is for appropriate for the types of licensed activities being inspectedsurveying license operations (e.g., survey meters, air samplers, lab counting equipment for smears and isotope identification); and,

h. Licensee activities observed by the inspector(s), including activities at temporary job sites, field stations, or satellite facilities, are 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 conducted in sufficient scope to demonstrate that it was adequate to address the health and safety and security of licensed activities;

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;

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c. Any violations and/or unresolved items identified during previous 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. As appropriate, licensee activities should be observed by the inspector(s), including activities at temporary job sites, field stations, or satellite facilities, 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 that may be necessary as a result of inspection activities. Verify that processes or procedures have been established to capture inspection-related findings that that indicate the need to modify, correct, or amend licenses. If the program has identified any such inspection-related findings, confirm that those actions have been completed as necessary. For programs with separate inspection and licensing staff, determine how inspection-related matters are communicated to licensing staff and how licensing actions are initiated and completed as necessary.

6.11. Effectiveness of the NRC Region=s or Agreement State=s internal program to evaluate its inspectors in the field. The reviewer should ensure verify that the NRC Regional or Agreement State supervisors evaluate accompany all inspectors on at least one inspection in the field per year. to evaluate the inspector's performance. Assess whether the methods utilized for conducting supervisory accompaniments are effective in identifying performance issues.

E. Review Information Summary

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

a. Licensee name;
b. License number;
c. Licensee lLocation(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);

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e. Type Description of licensed operation activity (e.g., program code or license category);

f. Inspector(=s) initials;
g. Type of inspection (e.g., routine/, initial/special/reciprocity;reactive, followup, announced/, unannounced; office/temporary job site, team, or other);
h. Date(s) of inspection;
i. Date inspection findings were issued; and,
j. Reviewer's Ccomments 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 principal reviewer is not required to should not feel obligated to use Appendix A, but may find it to be a as a useful toolmeans for of 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. Due to the NRC policies on sensitive information, nNot all the information maintained in the reviewer'=s summary of the inspection casework files reviewed or inspection accompaniments performed will be includedappear in the IMPEP report. The Team Leader can provide

guidance as to what information is necessary to include in the report. list of inspection casework reviews in the report=s appendix. Please contact the IMPEP Project Manager for the current guidance and format on the report=s inspection casework appendix. Any information that is included in the IMPEP report

4. Comments in regard to inspection casework that will appear in the report=s appendix shouldmust be factual, should be concise, and should concentrate on casework identified or observed performance deficiencies and their root cause(s).

F. Discussion of Findings with NRC Region 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.

Inspector Accompaniments

1. In addition to performing a file review of the selected inspections, the principal reviewer for this indicator (or another qualified IMPEP team member, as appropriate) should complete an appropriate number of accompaniments of the NRC Region=s or Agreement State's inspectors to observe, on a first-hand basis, the inspectors= demonstration of proper inspection techniques and areas of emphasis. Accompaniments should be performed prior to the on-site portion of the IMPEP review, if possible. In accordance with the NRC Region=s or Agreement State=s work schedules, the reviewer should attempt to observe a representative sample of inspectors and licensee types, concentrating on inspections of licensed facilities which have greater health and safety potential. One-day inspections are preferable for accompaniments, so that the reviewer may observe the entire inspection process from entrance to exit.

2. In most cases, the goal for an Agreement State review is to accompany one-half of the program=s inspectors. For larger Agreement States and NRC Regions, the goal is to accompany four or five inspectors. Priority should be given to newly qualified inspectors and those that have not been accompanied during previous IMPEP reviews.

3. IMPEP accompaniments are performance-based evaluations of inspector effectiveness. It is important that these accompaniments focus on health and safety

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~~issues. It is not the role of the reviewer to help with the inspection effort, but rather to observe the inspector=s work.~~

~~4. Prior to the inspection, the reviewer and inspector should discuss:~~

~~a. the extent of the reviewer=s participation in the inspection (observation, not active participation);~~

~~b. the way the reviewer=s presence will be explained to the licensee; and~~

~~c. the method that will be used in evaluating the inspector=s performance.~~

~~5. Unless determined otherwise by the team leader, results of the inspector accompaniments should be communicated to the inspector and the program=s management the week of the accompaniment, especially if the evaluation uncovers performance weaknesses. If possible, the review team member completing the accompaniments should schedule a close-out meeting with program management to ensure that all findings are fully communicated and understood. The review team member performing the accompaniments should communicate to the program=s management that the results of the accompaniments are preliminary and will be used in the overall assignment of a finding for this indicator.~~

~~6. Appendix B, Inspector Accompaniment Guidance, was developed to assist the reviewer in completing the inspector accompaniments. The reviewer should not feel compelled to address every item on the evaluation form. Inspector accompaniment information should be summarized as described in Section E, above.~~

~~G. Discussion of Findings with NRC Region or Agreement State~~

~~The reviewer should follow the guidance given in FSME Procedure SA-100, *Implementation of the Integrated Materials Performance Evaluation Program (IMPEP)*, for discussing technical findings with inspectors, supervisors, and managers.~~

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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 REGION: _____ REVIEWER: _____ CASEWORK FILE NO.: _____

~~**GENERAL INFORMATION:**~~

~~LICENSEE: _____ LICENSE # _____~~

~~LOCATION: _____~~

~~LICENSE TYPE _____ PRIORITY: _____~~

~~INSPECTION DATE: _____ INSPECTOR: _____~~

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:

~~**COMMUNICATIONS:**~~

~~SUPERVISORY REVIEW BY: _____ DATE: _____~~

~~IMPEP REVIEW BY: _____ DATE: _____~~

~~IMPEP FINDINGS DISCUSSED WITH: _____ DATE: _____~~

~~APPENDIX B (continued)~~

APPENDIX B

INSPECTOR ACCOMPANIMENT SUMMARY SHEET~~GUIDANCE~~

A/S OR REGION: REVIEWER: ACCOMPANIMENT NO.:

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

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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	

~~**GENERAL INFORMATION:**~~

~~LICENSEE: _____ LICENSE # _____~~

~~LOCATION: _____~~

~~LICENSE TYPE _____ PRIORITY: _____~~

~~INSPECTION DATE: _____ INSPECTOR : _____~~

~~**ADDITIONAL INFORMATION:**~~	~~COMPLETE G PARTIAL G~~
~~INSPECTION TYPE:~~ ~~ANNOUNCED G UNANNOUNCED G~~ ~~ROUTINE G INITIAL G~~ ~~FOLLOWUP G SPECIAL G~~	~~RADIOGRAPHY: OFFICE G FIELD G~~ ~~RECIPROCITY? Y N N/A~~

APPENDIX B (continued)

INSPECTION CONDUCTED WITHIN 25% OF SCHEDULED FREQUENCY? Y N N/A

	PERFORMANCE COMMENTS

SUMMARY OF EVALUATION

1. INSPECTOR'S PERFORMANCE RATING:
   MEETS OR EXCEEDS GUIDELINES ☐ NEEDS IMPROVEMENT ☐

2. COMMENTS:

3. THE INSPECTOR MIGHT BENEFIT FROM ADDITIONAL TRAINING IN:

~~APPENDIX B (continued)~~

~~4. EVALUATION DISCUSSED WITH~~

_____

~~ON~~

_____

ITEM	~~O.K.~~OK or N/A	COMMENTS ~~OR QUESTIONS~~
INSPECTOR'S PREPARATION		
ADEQUATE REVIEW OF LICENSE AND COMPLIANCE HISTORY		
INSPECTION PROCEDURE, GUIDANCE, PLAN OR FIELD FORM		
APPROPRIATE ~~SURVEY~~ RADIATION DETECTION AND MEASUREMENT INSTRUMENTS FOR ACTIVITIES INSPECTED ☐ CALIBRATED ~~G~~ ☐ INSTRUMENT RESPONSE CHECK, IF APPROPRIATE ~~G~~		
SUPPLEMENTAL MATERIALS: ☐ IDENTIFICATION ☐ REGULATIONS ~~G~~ ☐ FORMS DOSIMETRY ~~G~~ ID ~~G~~ ~~DOSIMETRY G SOURCES G~~ ~~ANEMOMETER G~~		
OPENING		

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~~APPENDIX B (continued)~~

~~INTERVIEW~~ 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, ~~OPERATION AND HANDLING OF RAM~~LICENSED ACTIVITIES IN PROGRESS	
INDEPENDENT AND/OR CONFIRMATORY MEASUREMENTS PERFORMED	
FACILITIES CHECKED FOR PROPER POSTING, MATERIALS CHECKED FOR PROPER LABELIING ~~, LABELING~~	
SECURITY VERIFIED ☐ SECURITY OF LESS THAN CATEGORY 2 ☐ SECURITY OF CATEGORY 2 OR HIGHER o VERIFICATION OF NSTS o BACKGROUND INVESTIGATIONS, ACCESS AUTHORIZATION, TRUSTWORTHINESS & RELIABILITY o PHYSICAL PROTECTION OF MATERIALS IN USE o PHYSICAL PROTECTION OF MATERIALS IN TRANSIT o REVIEW OF SELECTED RECORDS RELATED TO SECURITY REQUIREMENTS	
WORKERS CHECKED FOR PERSONAL DOSIMETRY	
~~WORKER~~ INTERVIEWS AND DISCUSSIONS CONDUCTED WITH: ☐ RAM USERS ☐ ~~G~~ ANCILLARY WORKERS ~~G~~	
VERIFICATION OF SHIELDING OF MATERIALS~~WIPES, SURVEYS, MEASUREMENTS TAKEN~~	
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	

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~~APPENDIX B (continued)~~

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 ~~G~~		
☐ RECEIPT & TRANSFER OF MATERIAL ~~G~~		
☐ INTERNAL AUDITS ~~G~~		
☐ SURVEYS & MONITORING ~~G~~		
☐ PERSONNEL DOSIMETRY, BIOASSAY ~~G~~		
☐ QUALIFICATION AND TRAINING OF PERSONNEL ~~G~~		
☐ OPERATING & EMERGENCY ~~PLAN &~~ PROCEDURES ~~G~~		
☐ RADIATION SAFETY COMMITTEE ~~MEETINGS, MINUTES~~ ~~G~~		
☐ AUTHORIZED USERS ~~G~~		
☐ INSTRUMENT CALIBRATION ~~G~~		
☐ ~~DOSE CALIBRATOR TESTS;~~ UTILIZATION LOGS ~~G~~		
☐ LEAK TESTS		
☐ WRITTEN DIRECTIVES ~~G~~		
☐ ~~GENERATOR - ASSAY, MOLY BREAKTHROUGH, LOGS~~TRANSPORTATION OF MATERIALS ~~G~~		
☐ WASTE MANAGEMENT, DISPOSAL ~~G~~		
☐ RELEASE OF AIR & SEWER EFFLUENTS ~~G~~		
☐ ~~QA & QC;~~EQUIPMENT & MAINTENANCE ~~G~~		
INSPECTOR'S PROFESSIONALISM		
USE OF PROPER HEALTH PHYSICS TECHNIQUES (SELF MONITORING, ETC.)		

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~~APPENDIX B (continued)~~

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 ~~INTERVIEW~~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 ~~REQUIREMENTS FOR CHANGE~~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.)		

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~~APPENDIX B (continued)~~

4.	EVALUATION DISCUSSED WITH INSPECTOR ON:
5.	EVALUATION DISCUSSED WITH SUPERVISOR/MANAGEMENT ON:

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~~APPENDIX B (continued)~~

~~VIOLATIONS~~	~~O.K.~~

Appendix C

Frequently Asked Questions

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

A1: Inspectors should be accompanied by their supervisor at least annually. ~~as described in the~~ 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 ~~in a particular calendar year~~annually, it should be documented by the supervisor ~~in the inspector=s personnel file~~. The documentation should include an explanation and ~~,~~ a proposed schedule for performing the ~~the next expected~~ accompaniment~~, and the supervisor=s signature~~.

Q2: What if ~~the~~ an inspector only ~~does~~ performs~~occasional~~ inspections infrequently or just a few times per year~~, such as a cross-trained license reviewer~~?

A2: Even ~~I~~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~~,~~. ~~if possible, unless the program has a policy or procedure that allows a longer interval between accompaniments. If there is a policy or procedure that allows for a longer interval, the program should perform accompaniments of inspectors who perform occasional inspections in accordance with that policy or procedure. We are aware of an NRC Region that has a policy in place to perform accompaniments of cross-trained license reviewers every 18 months. This is acceptable because their policy is documented.~~

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

A3: It is not required that the supervisor who performs accompaniments be a qualified inspector. However, ~~Yes,~~ supervisors that perform accompaniments should be strongly familiar with ~~experienced in~~ the program'~~=~~s inspection practices and procedures. The supervisor should also ~~at least~~ 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

~~The experience and knowledge will allow the supervisor to perform a better evaluation of the inspector. A supervisor experienced in inspections will know areas of concerns for certain license types and will be able~~ will enable the supervisor to provide more constructive feedback regarding ~~of~~ the inspector'~~=~~s ~~competency~~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, ~~Yes,~~ it is acceptable for ~~to have~~ senior program staff to perform inspector accompaniments when necessary and justified~~under certain circumstances~~. For example, ~~In Agreement States where the program manager is the immediate supervisor, accompaniments may be performed by experienced senior staff instead of the program manager, if the program manager is fulfilling other obligations. I~~in an Agreement State ~~that is experiencing staffing issues~~ where there is a vacancy in a supervisory position, the accompaniments may be performed by experienced senior staff during the time the vacancy is unfilled rather than not perform accompaniments at all due to the vacancy. ~~It is expected that supervisors generally conduct the accompaniments; however, it is preferable to have the accompaniments conducted by an experienced, qualified inspector in the circumstance that the supervisor is not available to accompany the inspectors.~~

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 Region 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. ~~related to medical uses.~~~~In the circumstance that the reviewer discovers that an inspector is not qualified to perform a particular type of inspection during that type of inspection, the reviewer should document the issue and discuss with the inspector and his/her supervisor following the review. The reviewer should allow the inspection to continue as long as there are no health and safety concerns. In the event that the inspector=s lack of qualification causes health and safety concerns to go unnoticed or undocumented, the reviewer should bring the concern to the attention of the program=s~~

~~management. Program management should explain the health and safety concern to the licensee. During the accompaniment close-out meeting, the reviewer should mention to the inspector=s supervisor and/or program management that the inspector was not qualified to perform that type of inspection.~~

Q6: If ~~A~~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~~has remained adequate over~~ 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 ~~is~~ perform~~ing~~ ~~only~~ 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 ~~There are no requirements that prohibit Agreement States from performing compliance-based inspections. It is at the Agreement State=s discretion to implement a performance-based inspection policy. The review should be conducted~~ in a manner that is consistent with ~~all~~current IMPEP guidance ~~documents~~ applicable to this indicator and the inspection policy of the State.

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

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A8: Inspectors should be accompanied by their supervisor at least annually. Therefore, s~~Yes, s~~upervisors who ~~routinely~~ perform inspections should also be accompanied annually. In Agreement States, sometimes Program Directors perform inspections and it ~~During an IMPEP review in 2003, a recommendation was made to the NRC to develop specific guidance on what level of supervisor needs to be accompanied, how often, and what documentation is necessary. Until this guidance is finalized, it should be assumed that any supervisor that performs inspections routinely should be accompanied at least annually.~~ 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, ~~the concerns are of health and safety significance,~~ 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~~and his/her~~ -supervisor as well as the Team Leader as soon as is practicable. ~~If concerns about an inspector=s performance are raised during an inspector accompaniment, the reviewer should evaluate the potential implications.~~ 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 ~~his/her~~ supervisor as well as the Team Leader~~after the accompaniment~~. In all cases, after the inspector has concluded the onsite inspection, the review team member should take a few moments with the inspector and ~~If the concerns are of health and safety significance, it is the responsibility of the reviewer to bring the concerns to the attention of the inspector and his/her supervisor. During the accompaniment close-out meeting, the reviewer should~~ discuss any observed or identified ~~the~~ 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 ~~and his/her~~ supervisor and/or program management.