

Comment Resolution Document
Summary of Comments Received on
SA-111, Formal Qualifications for IMPEP Team Members
and Team Leaders

I. Sent to the Agreement States, Non-Agreement States, and State Liaison Officers for Comment: STC-16-090, December 7, 2016

Comments Received:

- a. Organization of Agreement States email dated January 10, 2017.
- b. State of Washington e-mail dated December 19, 2016

Organization of Agreement States:

The OAS had no comments on this procedure.

State of Washington:

Comment 1: The layout of requirements and qualifications is very clear. It would be very helpful to Agreement State IMPEP team members, to know where to find the non-NRC resources and extra study references. For example, ANSI documents: it would be helpful to know if the NRC has digital copies that the state IMPEP team member could temporarily access while preparing for and/or while doing the IMPEP. Many states do not have these documents, which often cost over \$250 each.

Response: Comment noted. While the NRC does not maintain official copies of these documents, some staff have paper or electronic copies of these various publications in their personal files. You can contact the IMPEP Project Management team at: IMPEP.Resource@nrc.gov to request these documents if needed.

Comment 2: IMPEP Team Member training could be placed as part of the section V.B core training for IMPEP team members and leaders, as it is part of the required core training. It seems silly to have it called out in a separate section outside of the core training, when you have to reference it there anyway.

Response: Comment Noted. As written, the IMPEP core training is only one part of the Basic Training in V.B. In the subsequent sections, it is part of the qualification process for an individual to be approved to review the indicator. The procedure will not be revised.

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Comment 3: G.3. could include S201 materials security safety and control course in the event that the allegation involves category One or Two material. Most inspectors would've had this course as part of inspectors' core training.

Response: Comment partially incorporated. Section V.G.4. (not G.3.) has been revised to add this course as part of the "Supplemental" training. It is not being added under "Required" training as NRC team members do not have to be a journal qualified inspector in order to review this indicator unless their supervisor believes it is necessary. Also, as Agreement State team members do not review this indicator, it only applies to NRC personnel.

**II. Sent to the U.S. Nuclear Regulatory Commission Offices for Comment by
Memorandum dated December 12, 2016**

Comments Received:

- a. U.S. Nuclear Regulatory Commission, HQ, NMSS, OCHCO email dated December 15, 2016
- b. U.S. Nuclear Regulatory Commission, HQ, OGC e-mail dated January 11, 2017
- c. U.S. Nuclear Regulatory Commission, HQ, OIG email dated February 2, 2017
- d. U.S. Nuclear Regulatory Commission, Region I, Division of Nuclear Materials Safety; email dated January 9, 2017
- e. U.S. Nuclear Regulatory Commission, Region III, Division of Nuclear Materials Safety; email dated December 29, 2016
- f. U.S. Nuclear Regulatory Commission, Region IV, Division of Nuclear Materials Safety; email dated February 6, 2017

U.S. Nuclear Regulatory Commission, HQ, OCHCO; email dated December 15, 2016

Comment 1: SA-111 lists H-201, Advanced HP as a required training course but makes no mention of the H-117 & 122 which would normally be considered pre-reqs for attending H-201. The course description for H-201 does not "require" attending H-117 & 122 but states that they are highly recommended.

Response: Comment acknowledged, however, in IMC 1248, it is noted that, "Advanced Health Physics (H-201) is a challenging 2-week course that should not be taken unless the candidate has had previous health physics education or experience. The NRC offers two fundamental health physics courses (see Specialized Training Courses below) that should first be considered: Fundamental Health Physics I and II (H-122), a 2-week course, and Fundamental Health Physics III (H-123), a 1-week course. The candidate's resource or mentor or immediate supervisor should be able to help determine which courses, if any, the candidate should take before enrolling in the Advanced Health Physics (H-201) course."

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**U.S. Nuclear Regulatory Commission, HQ, Office of General Counsel; email dated
January 11, 2017**

Comment 1: In Section III. Background: Need to clarify that “radioactive materials” covers those materials under the States’ Section 274b Agreement with the NRC.

Response: Comment accepted. The procedure will be revised to note this clarification.

Comment 2: Various minor editorial comments.

Response: Some comments accepted.

**U.S. Nuclear Regulatory Commission, HQ, Office of Inspector General; email dated
February 2, 2017**

Comments:

Page 4, Paragraph E. 4., IMPEP Team Members and Team Leaders: Correct to state: “...as appropriate, sign the IMPEP Qualification cover sheet, forward copies of the IMPEP Qualification cover sheets and forms to the IMPEP project manager.”

Page 9. Paragraph 3.c.: This course does not appear in current I Learn. Same comment for Page 20, Paragraph 3.c.

Page 10, Paragraph 3. i.: The correct title in I Learn is: NRC Materials Control, Security Systems & Principles (S-201). Also, same comment for Page 12, Paragraph 3. g.

Page 10, Paragraph 4. e.: The correct course title in I Learn is Internal Dosimetry (H-312). Also, same comment for Pages 12 and 14, Paragraphs 4.f. and 4. d.

Page 12, Paragraph 4. e.: Title in I Learn is Air Sampling for Radioactive Materials (H-119).

Page 12, Paragraph 4. e.: Title in I Learn is (MARSSIM) Multi-Agency Radiation Survey and Site Investigation (H-121). Also, same comment for Page 14, Paragraph 4.c.

Page 15, Paragraph H. 1.a: The title in the NRC Website is, “NRC MD 5.8, “Proposed Section 247b Agreements with States.”

Page 16. Paragraph I.2.a: The title in I Learn is Sealed Source and Device Evaluation Workshop (G-116).

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Page 18, Paragraph J.1.d.: The title in the NRC Website is NRC IMC 2401, “Near-Surface Low-Level Radioactive Waste Disposal Facility Inspection Program.”

Page 18, Paragraph J. 1. e.: The title in the NRC Website is NUREG-1573, “A Performance Assessment Methodology for Low-Level Radioactive Waste-Disposal Facilities.”

Page 19, Paragraph K. 1. e.: The title in the NRC Website is NRC IMC 2641, “In-Situ Leach Facilities Inspection Program.”

Page 20, Paragraph L. 1. b.: The title in the NRC Website is NRC IMC 1248, “Qualification Programs for Federal and State Materials and Environmental Programs.”

Response: Comments accepted. The indicated sections will be corrected as noted.

**U.S. Nuclear Regulatory Commission, Region I, Division of Nuclear Materials Safety;
email dated January 9, 2017**

Comment 1: In Section III, Background, Should the TTC also be listed? We have had team members from the TTC participate on IMPEP teams recently.

Response: Comment accepted. The procedure will be revised to read “NMSS and other offices”.

Comment 2: In all Indicator sections, add the respective SA procedure for reviewing the indicator.

Response: Comment accepted. The procedure will be revised to add the SA procedure(s) for reviewing the respective indicator.

Comment 3: In Section VII.B., change to read, “Justification for the waiver or extension must be documented and maintained in the individual’s training file (for NRC staff this will be maintained in the iLearn system). This works for NRC but not Agreement State staff.

Response: Comment noted. However, Agreement State personnel IMPEP training documentation is now maintained in the ilearn system by ASPB staff. The procedure will not be revised.

Comment 4: Can Agreement State personnel review the Compatibility Requirements indicator?

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Response: As this indicator requires the individual to complete the review of 3 regulation review packages, only NRC personnel can review this indicator.

Comment 5: Various minor editorial comments.

Response: Most comments accepted.

**U.S. Nuclear Regulatory Commission, Region III, Division of Nuclear Materials Safety;
email dated December 29, 2016**

Comment 1: The section numeration appears to be off or at a minimum confusing. There appears to be two Section I's. One for Introduction and one for a later section on Documentation of IMPEP Qualifications. The Documentation section appears to be Section VI.

Response: Comment noted. However, the Documentation of IMPEP Qualifications is numbered as "Section VI".

Comment 2: 1st paragraph of Objectives, last sentence: incorrect reference to the section that allows exemptions. Should refer to Section VII.

Response: Comment accepted. Procedure revised to refer to Section VII .

Comment 3: Section V.D.1.c – there is minimal value in having a team member become acquainted with IMC 0610 as there are no elements required for adequacy or compatibility outlined in IMC 0610. One aspect of this indicator is the timeliness of inspection records, of which the expected requirements are spelled out in IMC 2800 or applicable IMPEP procedures for this indicator. Suggest deleting or moving to supplementary training.

Response: Comment noted. However, as this procedure is listed under self-study, it only requires that the individual "should" be "familiar" with its content; it is not a requirement.

Comment 4: Section V.E.2.c - there is minimal value in having a team member become acquainted with IMC 0610 as there are no elements required for adequacy or compatibility outlined in IMC 0610. Agreement States are permitted to develop any form of inspection record as they see fit so long as any findings are documented and justified. Suggest deleting or move to supplementary training.

Response: Same response as Comment 3.

Comment 5: Section V.E.3.j and k – these courses may not be available to Agreement State team members leading to undue documentation to prove equivalency or a waiver. Although these courses are required for NRC inspector-qualification, the

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lack of taking these courses would not necessarily impede the ability of an IMPEP team member to fulfill the roles, responsibilities, and objectives in reviewing this indicator. Suggest deleting or move to supplementary training.

Response: Comment accepted. These courses will be moved under supplementary training.

Comment 6: Section V.F.2.a, c, and d – these are inspection-specific documents and would not necessarily have any bearing on a team member’s ability to effectively review this indicator. Suggest deleting or moving to supplementary training in Section V.F.4.

Response: Comment noted. However, as these are listed as self-study, and a license reviewer should be acquainted with reciprocity and inspection requirements as well, the procedure will not be revised.

Comment 7: Section K.1.a – 10 CFR Part 40 is specifically called out but would already be covered under the Basic IMPEP Team Member Training Requirements. Suggest deleting.

Response: Comment noted. However, this is listed under self-study to state again that the reviewer assigned to this indicator should be familiar with this specific Part.

Comment 8: Section [V]II.B, last sentence – references documenting and maintaining waivers and extensions in iLearn, which would not be applicable to Agreement State team members. Suggest adding clarification like in the succeeding section.

Response: Comment noted. However, training documentation for Agreement State personnel performing IMPEP reviews is now entered into the ilearn system.

Comment 9: Appendixes A, B, and C – corresponding changes as suggested above

Response: Comment accepted. The corresponding changes for Comment 5 will be made to Appendix C.

Comment 10: Several sections (V.D.2, V.E.3, V.L.3, and Appendix C) reference the G-304 Inspecting for Performance training course. This course is no longer offered and it should be removed from SA-111.

Response: Comment accepted. The procedure will be revised to remove this course.

Comment 11: The MD 5.10 Handbook was deleted and replaced by NMSS Procedure SA-111. This is a good idea, allowing future procedural and editorial changes without opening the Management Directive.

Response: Comment acknowledged. Thank you.

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**U.S. Nuclear Regulatory Commission, Region IV, Division of Nuclear Materials Safety;
email dated February 6, 2017**

Region IV had no comments.