



**UNITED STATES**  
**NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

**OFFICE OF THE  
INSPECTOR GENERAL**

February 24, 2014

MEMORANDUM TO: Mark A. Satorius  
Executive Director for Operations

FROM: Stephen D. Dingbaum */RA/*  
Assistant Inspector General for Audits

SUBJECT: STATUS OF RECOMMENDATIONS: NRC'S OVERSIGHT  
OF INDUSTRIAL RADIOGRAPHY (OIG-12-A-15)

REFERENCE: MEMORANDUM DATED JANUARY 28, 2014

Attached is the Office of the Inspector General's (OIG) analysis and status of recommendations as discussed in the agency's response dated January 28, 2014. Based on the agency's response dated January 28, 2014, recommendations 1, 2, 3, 4, 7, and 8 remain resolved. Please provide an updated status of the resolved recommendations by February 2, 2015.

If you have any questions or concerns, please call me at 415-5915 or Sherri Miotla, Team Leader, at 415-5914.

Attachment: As stated

cc: R. Mitchell, OEDO  
K. Brock, OEDO  
J. Arildsen, OEDO  
C. Jaegers, OEDO  
B. Holian, FSME

## Audit Report

### AUDIT OF NRC'S OVERSIGHT OF INDUSTRIAL RADIOGRAPHY

#### OIG-12-A-15

#### Status of Recommendations

Recommendation 1: Require license reviewers to write radiography licenses in a manner that clearly and consistently specifies whether or not licensees are authorized to conduct certain activities (such as offshore, lay-barge, or underwater radiography).

Agency Response Dated  
January 28, 2014:

Staff is revising NUREG-1556, Volume 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Industrial Radiography Licenses," to inform applicants who plan to perform radiographic operations on lay-barges, offshore platforms, or underwater locations that they must specifically request these operations and provide specific operating and emergency procedures to address these unique operations and that specific license conditions will be included for these activities.

In November 2011, staff published a draft of NUREG-1556, Volume 2, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Industrial Radiography Licenses" for comment. The draft volume included a new Appendix D that provided detailed guidance regarding lay-barge, offshore platform, and underwater radiography procedures and precautions.

The draft document remains available to the public on the NRC's public Web site. The final revision of NUREG-1556, Volume 2, Revision 1, is tentatively scheduled to be issued in the summer of 2014. In the last update, the staff had listed October 2013 as the estimated date to finalize the draft volume. However, since all of the 21 volumes in the NUREG-1556 are currently under revision, the October 2013 date has been extended due to the increase in workload for revising the entire NUREG-1556 series. Staff met with staff from the Office of the Inspector General on August 28, 2013, to explain the cause of the delay in finalizing NUREG-1556, Volume 2, Revision 1.

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### AUDIT OF NRC'S OVERSIGHT OF INDUSTRIAL RADIOGRAPHY

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#### Status of Recommendation

##### Recommendation 1 (cont.):

The staff is continuing its efforts to revise NUREG-1556, Volume 20, "Consolidated Guidance About Materials Licenses: Guidance About Administrative Licensing Procedures," which will include a new draft standard authorization in Item 9: "Authorized Use," and will clarify lay-barge, offshore, and underwater authorization. The final revision of NUREG-1556, Volume 20, is tentatively scheduled to be issued in December 2014. The staff would like to note that some consideration is being given to remove Volume 20 from the NUREG-1556 series and develop a series of Office or division level procedures. Volume 20 was designed to provide guidance about administrative licensing procedures. However, since the document is in a NUREG format it cannot be readily revised to meet the changing needs for licensing. The final form of Volume 20 or the procedures will include this change.

Completion Date: January 31, 2015

##### OIG analysis:

The proposed corrective actions meet the intent of the recommendation. OIG will close this recommendation when: a) the agency provides to OIG copies of the completed (issued) revised versions of NUREG-1556 Volumes 2, and 20 or a series of Office or division level procedures; and b) OIG determines that these include changes to require license reviewers to write radiography licenses in a manner that clearly and consistently specifies whether or not licensees are authorized to conduct certain activities.

##### Status:

Resolved.

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### AUDIT OF NRC'S OVERSIGHT OF INDUSTRIAL RADIOGRAPHY

OIG-12-A-15

#### Status of Recommendation

Recommendation 2: Revise NRC inspection guidance to define the NRC radiography licensees' location that must be inspected each inspection cycle.

Agency Response Dated  
January 28, 2014:

Based on the information contained in the audit, the staff committed to ensure that radiography licensees' radiation safety officers (RSOs) are contacted as a part of each inspection. The staff will revise appropriate inspection guidance in Inspection Procedure (IP) 87121, "Industrial Radiography Programs," to articulate: (1) locations that must be inspected and at what frequency, specifically when licensees have multiple locations of use, (2) inspection of the RSO's location, field stations, and temporary job sites with an acceptable frequency, and (3) an expectation that the licensee's primary RSO be contacted as a part of every inspection.

Completion Date: January 31, 2015

OIG analysis: The proposed action meets the intent of the recommendation. OIG will close this recommendation when: a) the agency provides copies of the revised and finalized inspection guidance to OIG; and b) OIG determines that the inspection guidance specifies how inspectors determine the licensee location that must be inspected each inspection cycle.

**Status:** Resolved.

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### AUDIT OF NRC'S OVERSIGHT OF INDUSTRIAL RADIOGRAPHY

#### OIG-12-A-15

#### Status of Recommendation

Recommendation 3: Revise NRC inspection guidance to include a reliable methodology to select NRC radiography licensee field stations for inspection.

Agency Response Dated  
January 28, 2014:

The staff will revise inspection guidance IP 87121 "Industrial Radiography Programs," to ensure that a methodical approach is followed when selecting field stations for inspection and that a sufficient number of field stations are routinely inspected while taking into account risk-significant locations.

The staff planned to revise IP 87121 once the work on NUREG-1556, Volume 2, Revision 1 was completed. However, because of the delay in completing the NUREG-1556 series, the staff decided to begin revision of IP 87121 before completion of the NUREG-1556 series. The staff established a working group and have begun an initial revision of IP 87121.

Completion Date: January 31, 2015

OIG Analysis: The proposed actions meet the intent of the recommendation. OIG will close this recommendation when: a) the agency provides copies of the revised and finalized inspection guidance; b) and OIG determines that the inspection guidance specifies a reliable methodology to select NRC radiography licensee field stations for inspection.

**Status:** Resolved.

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### AUDIT OF NRC'S OVERSIGHT OF INDUSTRIAL RADIOGRAPHY

#### OIG-12-A-15

#### Status of Recommendation

Recommendation 4: Revise NRC inspection guidance to require NRC inspectors to take additional steps to arrange a temporary job site inspection for an NRC licensee that has not had a temporary job site inspection for a defined minimum number of consecutive routine inspections.

Agency Response Dated  
January 28, 2014:

The staff will revise the inspection guidance in IP 87121, "Industrial Radiography Programs," to establish the expectation that inspectors take clearly defined measures to arrange for a temporary job site inspection when an NRC licensee, whose primary operations are conducted at temporary jobsites, has not had a temporary job site inspection for a defined minimum number of consecutive inspections.

The staff planned to revise IP 87212 once the work on NUREG-1556, Volume 2, Revision 1 was completed. However, because of the delay in completing the NUREG-1556 series, the staff decided to begin revision of IP 87121 before completion of the NUREG-1556 series. The staff established a working group and have begun an initial revision of IP 87121.

Completion Date: January 31, 2015

OIG Analysis: The proposed action meets the intent of the recommendation. OIG will close this recommendation when: a) the agency provides copies of the revised and finalized inspection guidance; and b) OIG determines that the inspection guidance specifies requirements for NRC

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### **AUDIT OF NRC'S OVERSIGHT OF INDUSTRIAL RADIOGRAPHY**

**OIG-12-A-15**

#### **Status of Recommendation**

Recommendation 4 (cont.):

inspectors to take additional steps to arrange a temporary job site inspection for an NRC licensee that has not had a temporary job site inspection for a defined minimum number of consecutive routine inspections.

**Status:** Resolved.

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### AUDIT OF NRC'S OVERSIGHT OF INDUSTRIAL RADIOGRAPHY

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#### Status of Recommendation

Recommendation 7: Establish a means to increase awareness of when and where NRC licensees are conducting radiography in NRC jurisdiction offshore.

Agency Response Dated  
January 28, 2014

In June 2013, staff held a conference call with regional inspectors to discuss the possibility of requesting licensees to notify the NRC if they have been or are performing radiographic operations in offshore Federal waters. While it is not a requirement for radiography licensees to notify the NRC of these activities, the staff asked licensees to voluntarily provide notification to the NRC when conducting radiography in NRC jurisdiction offshore. Furthermore, it was noted there is a very small number of NRC licensees that would perform radiography activities in offshore Federal waters since all gulf coast states are Agreement States. NRC reciprocity regulations allow Agreement States licensees to work offshore for up to 360 days.

The staff reviewed the requirements set forth in 10 CFR Part 34 and sought the Office of the General Counsel's (OGC) legal opinion as to whether a license condition could be added that would require licensees to notify the NRC when conducting radiography offshore. OGC stated that in order to add a license condition to an existing licensee license, the NRC would have to issue an Order which shall have supporting basis under the Atomic Energy Act to justify the action being proposed. The staff determined that NRC does not have supporting basis under the Atomic Energy Act to issue an Order requiring licensees to notify NRC when conducting radiography activities offshore. However, staff will continue its efforts to document the voluntary notifications from NRC licensees that will conduct radiography activities in offshore Federal waters.

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#### Status of Recommendation

Recommendation 7 (cont.):

Completion Date: January 31, 2015

OIG Analysis:

The proposed actions meet the intent of the recommendation. OIG will close this recommendation when: the agency provides documentation that the practice of NRC staff asking licensees to voluntarily provide notification to the NRC when conducting radiography in NRC jurisdiction offshore, has been codified, in either IP 87121, or another place the agency deems appropriate.

**Status:**

Resolved.

## Audit Report

### AUDIT OF NRC'S OVERSIGHT OF INDUSTRIAL RADIOGRAPHY

#### OIG-12-A-15

#### Status of Recommendations

Recommendation 8: Revise NRC inspection guidance to include guidance for inspectors conducting inspections when the NRC licensee's facility is located in an Agreement State.

Agency Response Dated  
January 28, 2014

The staff will revise inspection guidance in IP 87121, "Industrial Radiography Programs," to clearly define expectations, including records and other information inspectors should review for conducting an inspection of a NRC licensee who is located in an Agreement State.

The staff planned to revise IP 87212 once the work on NUREG-1556, Volume 2, Revision 1 was completed. However, because of the delay in completing the NUREG-1556 series, the staff decided to begin revision of IP 87121 before completion of the NUREG-1556 series. The staff established a working group and have begun an initial revision of IP 87121.

Completion Date: January 31, 2015

OIG Analysis: The proposed action meets the intent of the recommendation. OIG will close this recommendation when: a) the agency provides copies to OIG of the revised and finalized inspection guidance; and b) OIG determines that it includes guidance for NRC inspectors conducting inspections of NRC licensee facilities located in Agreement States.

**Status:** Resolved.