



STEVEN A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

FRANK KEATING
Governor

September 6, 2002

Paul Lohaus, Director
Office of State and Tribal Programs
US Nuclear Regulatory Commission
Washington, DC 20555-0001

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STP

Dear Mr. Lohaus:

We appreciated the opportunity to host the IMPEP team during the program evaluation July 15-19. We felt that the evaluation team was fair and comprehensive in their evaluation. Steve Thompson, Executive Director of the DEQ emphasized to me how impressed he was by the thorough and well laid-out nature of the evaluation, and the use of specific standards for evaluation. This was his first significant contact with the Nuclear Regulatory Commission, and it left him with a very favorable impression.

In general, we agree with the draft IMPEP report, but we do have a few minor clarifications and updates:

1. We are continuing the enhanced management attention to the due dates of inspections, especially core inspections. Initial inspections are also receiving enhanced attention.
2. We continue to work towards the goal of improving timeliness of inspection reports. As the report indicated, because of increased management oversight, our performance in this area has improved this year, but it is still not where we want it to be.
3. We are ensuring current inspections are properly documented. What, if anything, to do about past inspections with documentation problems has not been decided.
4. Management accompaniments are being conducted. Mike Broderick accompanied Mohammed Idrissa in August, and another planned accompaniment had to be cancelled due to illness. At least one more accompaniment will be done in September, and all AEA inspectors will be accompanied by Mike Broderick or Pam Bishop during CY 2002.
5. Per the IMPEP Team recommendation, all license terminations are now having a license amendment indicating termination issued, rather than being terminated by



1. a letter as was done previously. This has been done retroactively for licenses terminated prior to the IMPEP.
2. On page 9, Section 4.1.2, the final paragraph indicates that all sources of radiation require a license; actually, only a limited number of NARM uses require licensing at this time. It is expected that this will change in the future, whether through federal action or state rulemaking.
3. On page 5, second paragraph, the date of 2002 should be replaced by a date of 2000.
4. On page C.1, File No. 2, inspection priority should be 3.
5. On page C.1, File No. 3, inspection priority should be 2. Though the inspection was overdue, note that it was not due till 12/00.
6. On page C.2, File No. 8, the inspection was not overdue. Inspection was due 7/01, so not overdue until 4/02.

Again, I appreciate the work of the IMPEP and of the NRC staff. If we can be of assistance to the IMPEP review in any way, please do not hesitate to contact me or Pam Bishop at 405-702-5100.

Sincerely,



Mike Broderick
Environmental Program Manager
Radiation Management Section