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Date: 11/8/02 4:10PM
Subject: Draft IMPEP Report

Pat,

Attached are our comments to the IMPEP Draft Report letter dated October 23, 2002. As we discussed by phone, there are no disagreements with the content within the report. If you have any questions, please contact me at 501-661-2173.

Look forward to seeing you at the MRB.

Jared W. Thompson, Program Leader
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**ARKANSAS DEPARTMENT OF HEALTH
RADIATION CONTROL & EMERGENCY MANAGEMENT
RADIOACTIVE MATERIALS PROGRAM**

**COMMENTS ON DRAFT IMPEP REPORT
DATED OCTOBER 23, 2002**

Page 1 Department Organization – Paragraph 3

“The Group Leader reports to the Statewide Services Leaders who reports directly to a seven member Agency Leadership Team,”

Page 6 License Type Clarification – Paragraph 2

The identified academic license was not a broad scope. This should also be changed on page C.6. Inspection Casework Reviews under File Number 23 and Accompaniment Number 1.

Page 10 Technical Quality of Licensing Actions – Paragraph 2

Please change the wording regarding the Section tracking system. Effective October 1, 2002, the Program implemented a central tracking system for licensing actions. We are also requesting that Recommendation Number 3 on Page 14 be removed from the Draft Report because this recommendation has been implemented.

Page D.4. License Casework Reviews – File Number 13; Comment d.

An amendment was issued to the licensee identifying the oncologists as the only approved authorized users. This amendment also requires a three-person treatment team consisting of the neurosurgeon, approved medical physicist and an authorized user to be physically present during patient treatment.

I have talked with Mike Stephens of Florida and he agreed that this was acceptable. Please remove from the Draft Report.

Page E.1. Incident Casework Reviews – File Number 2

Documentation for the licensee stated that during this incident the radiographer was always present. The radiographer did not leave the work site to contact the RSO. The Department interviewed the radiographer and accepted his statement as an indication of compliance with the two-man rule. This was not identified in NMED because there was no violation regarding the two-man rule nor did it have any affect on the outcome of the incident.

Page E.2. Incident Casework Reviews – File Number 4

This incident was closed out on November 12, 2002.