

October 2003 BiMonthly Report
as of
17 September 2003

Recommendation 1.

The review team recommends that the Office use a fully documented interim qualification program for inspectors.

An update to the interim qualification program addressed in our IMPEP response dated 31 March 2003 is contained in **ATTACHMENT A and ATTACHMENT A-1:**

- Dennis 8-03 Authorization .doc
- Charma-8-03 RAM-Provisional Authorization.doc
- Training tracking spreadsheet(rev1).xls

Additional training courses need to be secured for C. Clay in addition to in service training and mentoring for each inspector.

Recommendation 2.

The review team recommends that the Office implement the action plan and perform inspections of core licensees at their appropriate frequencies.

As presented in previous submissions and our response dated 31 March 03

It is felt that positive actions have been implemented to address the inspection backlog and to prioritize core inspections. Unfortunately, as stated during previous conference calls and also during the IMPEP review, this program is re-building with all new staff at various stages of training and experience.

We have made a concerted effort to secure the necessary training and to further this training through mentored inspections. It should also be understood that the program, due to maternity leave and past illnesses has been struggling to gain ground to complete our mission.

Although there are still a number of overdue inspections on the books they are being dealt with in a progressive manner in an effort to capitalize on previous formal training and past experiences with similar license types.

The prospect of utilizing temporary employees from adjoining states to assist in decreasing this backlog was entertained. However, due to internal bureaucracy issues and the time necessary to overcome them in addition to the additional oversight of these individuals it was felt that a more positive approach was to direct these efforts to internal training and completion of the tasks facing this program.

As reflected in **ATTACHMENT B** this program is facing 8 (eight) Core inspections that are overdue as of this date 22 September 2003. On a more positive note your attention is directed to the progress made since our last conference call. A total of 6 (Six) inspections (3 Core and 3 non-core) have been completed. Completion of our tasks is possible when given the time, opportunity and availability of staff to address these issues. We are sympathetic to the need to maintain a timely inspection frequency. However, in concert with completion of inspections there is the need for an ongoing element of training necessary to complete the instruction of inspectors to handle the task of inspection and other requirements of the program. The expansion of their understanding of the regulations that impact this inspection arena in addition to addressing other issues that are the responsibility of this program is an ongoing process.

Recommendation 3:

The review team recommends that the Office inspect core licensees granted reciprocity in accordance with the criteria in IMC 1220.

To date we have issued 15 (Fifteen)-reciprocity licenses. As of this date (22 Sept 2003) 10 (Ten) of these licensees are considered CORE licenses and we have performed 3 (three) reciprocity inspections.

Recommendation 4:

The review team recommends that the State adopt overdue regulations required for compatibility.

The office has been, and will continue to work towards this goal. Changes in our regulations to address these issues are being made. It is anticipated that at least one, possibly two additional meetings of the Advisory commission sub committee is necessary to finalize this document for submittal to the commission and then public hearing. It also needs to be understood that making changes to our regulations to maintain compatibility often impacts on our x-ray regulations. This often necessitates regeneration of or restructuring of the regulatory language or structure such that our x-ray regulations are not adversely impacted by adjustments in regulatory language to ensure compatibility with the NRC.

At this time, we are on target for a hearing by mid / late fall 2003.

Recommendation 5:

The review team recommends that the office train and qualify a sufficient number of reviewers to conduct and sign safety evaluations of SS&D applications in accordance with NRC/OAS Training Working Group Recommendations.

Our previous response remains in effect. We have discussed this matter with the licensee for whom we maintain SS&D sheets and have requested that they formally request transference of these sheets to the MA program. To date a formal request has not been received. At this time, the office still maintains SS&D sheets for two portable gauge devices manufactured by one company.

To address this matter in the short term this Office offers the following solutions:

- The manufacturer, for whom we maintain these SS&D sheets, has been asked to submit a request to this Office to transfer these sheets to Massachusetts where this company produces similar devices that have been reviewed by the state of MA. MA would review all new or amended sheets offered by this licensee in the future.
- If, in the short term this office is asked to entertain a new license request that requires SS&D reviews for a company licensed in another agreement state or by the NRC the company will be asked to have the devices reviewed and maintained by these licensing entities.
- If this is not possible, the Office will solicit assistance from the New England Compact to review these sheets. These SS&D sheets would be issued and maintained by the state of Rhode Island.

To address this matter in the long term the following solution is offered:

- Training for at least two members of this Office will be secured at the earliest possible date. This training will be solicited once core training, that is more germane to our program needs, has been obtained.

ATTACHMENT A

RHODE ISLAND
DEPARTMENT OF HEALTH
RADIATION CONTROL AGENCY

PERSONNEL FILE MEMORANDUM

TO: Dennis Klaczynski, Radiological Health Specialist/

FROM: John L. Ferruolo, Supervisor Radiological Health *J. Ferruolo*

DATE: 29 August 2003

SUBJECT: Authorization to perform selective independent inspections

CC: Marie Stoeckel, Chief, Office of Occupational and Radiological Health

Mr. Klaczynski is hereby authorized to perform independent inspections of the following radioactive materials licenses:

License Type	NRC License Type	Date Authorized
Broadscope	Academic (01100)	7/03 limited
	Medical (02110)	
Self-Contained Irradiators	< 370 TBq (03510)	2/03
Nuclear Medicine	Med. Pvt no QMP (02201)	11/02
	Med. Pvt QMP (02200)	11/02
	Med Inst QMP (02120)	11/02
Nuclear Pharmacy	Nuclear Pharmacy (02500)	
Industrial Radiography	Radiography (03320)	2/03
Civil Defense	Civil Defense (03170)	2/03
Teletherapy	Teletherapy (02300)	
Stereo Radiosurgery	Radiosurgery (02310)	
Veterinary	Vet (02400)	11/02
Research/Dev	R/D (03620)	11/02
GL Distribution	GL Dist (03240)	
Measuring Sys	Measuring Sys (03124)	11/02
Mfg Dist	Mfg Dist (03214)	
Source Shielding	Shielding (11210)	1/03
Gauges	Fixed (03120)	1/03
	Portable (03121)	1/03

Mr. Klaczynski has received mentoring in the designated and or related categories identified above and I have accompanied this inspector on at least one inspection of the license type(s) or a related license type indicated above. During these accompaniments Mr. Klaczynski demonstrated knowledge of RIRCA regulations and inspection procedures related to the License type(s) indicated above. As of the indicated date(s) it is determined that he is capable of performing independent inspections of the license types annotated above.

ATTACHMENT A: Dennis Klaczynski

A review of Mr. Klaczynski's inspection reports, by J. L. Ferruolo revealed that he adequately documented the required areas and also adequately documented the violations found during the inspections. It is understood as of 8/20/03 that Mr. Klaczynski is still in need of additional experience in these categories but his knowledge and experience are considered adequate to accomplish these inspection tasks and gain further experience in doing so.

Dennis-8-03 Authorization.doc

ATTACHMENT A: Charma Clay

RHODE ISLAND
DEPARTMENT OF HEALTH
RADIATION CONTROL AGENCY

PERSONNEL FILE MEMORANDUM

TO: Charma Clay, Industrial Hygienist

FROM: John L. Ferruolo, Supervisor-Radiological Health *JL Ferruolo*

DATE: 29 August 2003

SUBJECT: Authorization to perform limited independent inspections

CC: Marie Stoeckel, Chief, Office of Occupational and Radiological Health

Based on: 1) on-the-job training, 2) mentored accompaniments, 3) successful completion of selective U.S. Nuclear Regulatory Commission-sponsored training courses, 4) review of inspection reports submitted to the Radioactive Materials Section supervisor and 5) previous experience with portable gauge devices, Charm Clay (Industrial Hygienist) is hereby granted provisional authorization to perform independent inspections of the following categories of radioactive material license holders:

License Type	NRC License Type	Date Authorized
Broadscope	Academic (01100)	
	Medical (02110)	
Self-Contained Irradiators	< 370 TBq (03510)	8/03 limited
Nuclear Medicine	Med. Pvt no QMP (02201)	
	Med Inst QMP (02120)	
Nuclear Pharmacy	Nuclear Pharmacy (02500)	
Industrial Radiography	Radiography (03320)	
Civil Defense	Civil Defense (03170)	8/03
Teletherapy	Teletherapy (02300)	
Stereo Radiosurgery	Radiosurgery (02310)	
Veterinary	Vet (02400)	10/02
Research/Dev	R/D (03620)	10/02
GL Distribution	GL Dist (03240)	
Measuring Sys	Measuring Sys (03124)	8/03
Mfg Dist	Mfg Dist (03214)	
Source Shielding	Shielding (11210)	8/03
Gauges	Fixed (03120)	8/02
	Portable (03121)	8/02

This provisional authorization remains in effect until Ms. Clay has received final evaluation by the section supervisor, or it has been withdrawn. Additional formal training is needed to meet program training requirements.

ATTACHMENT A-1

MANDATORY COURSES	EMPLOYEE-year course completed				COMMENTS
	Jack Ferruolo	Dennis Klaczynski	Charma Clay	Bill Dundullis	
Diagnostic & Therapeutic NM (Use of N Med)	<u>85</u>	<u>W</u>	<u>P</u>	<u>84</u>	
Applied Health Physics (5 or 10 wk course)	<u>84</u>	<u>01</u>	<u>NA</u>	<u>80</u>	
Safety aspects of Industrial Radiography	<u>86</u>	<u>02</u>	<u>P</u>	<u>82</u>	
Inspection Procedures	<u>86</u>	<u>01</u>	<u>01</u>	<u>80</u>	
Licensing Practices & Procedures	<u>84</u>	<u>01</u>	<u>NA</u>	<u>80</u>	
Introductory Health Physics	<u>W</u>	<u>W</u>	<u>01</u>	<u>W</u>	
Transportation of Radioactive Materials	<u>91</u>	<u>03</u>	<u>NA</u>	<u>W</u>	
SUPPLEMENTAL COURSES					
Inspecting for Performance					
Protective Measures				<u>90</u>	
Sealed Source & Device Workshop					
Teletherapy/ Brachtherapy					
Well Logging				<u>81</u>	
Environmental Monitoring	<u>86</u>				
Radiation Protection Engineering	<u>86</u>			<u>80</u>	
Special Topics WkShop	<u>90</u>			<u>89</u>	
OTHER TRAINING					
Troxler or Other Gauge use			<u>99</u>		
Radiological Emergency Response				<u>79</u>	
MS Word	<u>99</u>				
MS Access	<u>00</u>				
MS Excel	<u>02</u>				
MS Powerpoint	<u>02</u>				

P:-- Pending -application submitted awaiting approval or employee Availability
W:-- Waived due to previous related training or qualifications
NA:-- Not applicable - limited duties/inspection categories.

ATTACHMENT B: INSP-TIMELINE 03

7D-026-01	ROGER WILLIAMS HOSPITAL	825 CHALKSTON E AVENUE PROV.	02110 Med. Institution Broad	1	15-Sep-98	15-Sep-99	01-Oct-99		DK-JF	TARGET AFTER LICENSE REVIEW COMPLETED
7D-045-02	WOMEN & INFANTS HOSPITAL OF RHODE ISLAND	101 DUDLEY STREET PROV.	02110 Med. Institution Broad	1	5-May-99	4-May-00	4-May-01	04-Sep-03	DK	PREP 18-28 AUG. INSPECT 29 AUG 03 REPORT FINAL 10 SEPT 03
3K-036-01	BROWN UNIVERSITY	NINNI JACOB CHP ENV HEALTH & SAFETY - BOX 1914 PROVIDENCE	01100 Academic Type A Broad	2	27-Jan-99	26-Jan-01	26-Jan-01		DK-JF	PREP 16-17 Oct. INSPECT 20-21 Oct, REPORT FINAL 28 Oct 03
3K-040-01	UNIV. OF RHODE ISLAND	16 REACTOR ROAD Narragansett	01100 Academic Type A Broad	2	4-Feb-98	4-Feb-00	04-Feb-01		DK +CC	PREP 23-24 Oct INSPECT 28-30 Oct. FINAL REPORT 5 Nov.03
3K-063-01	RI NUCLEAR SCIENCE CENTER	16 REACTOR ROAD Narragansett	01100 Academic Type A Broad	2	30-Jan-98	30-Jan-00	30-Jan-01		DK+CC	PREP 23-24 Oct INSPECT 28-30 Oct. FINAL REPORT 5 Nov.03
7B-019-01	LANDMARK MEDICAL CENTER	115 CASS AVENUE NEWPORT	02120 Med. Institution - QMP Req.	3	13-Apr-98	12-Apr-01	12-Apr-03	07-Aug-03	DK	REPORT FINAL 28 AUG 03
7B-035-01	WESTERLY HOSPITAL, THE	25 WELLS STREET WESTERLY	02120 Med. Institution - QMP Req.	3	1-Dec-98	30-Nov-01	01-Dec-03	22-Aug-03	JF-CC	INSPECT 3 SEPT 03, REPORT 10 SEPT 03

ATTACHMENT B: INSP-TIMELINE 03

7B-043-01	MEMORIAL HOSPITAL OF RHODE ISLAND	111 BREWSTER STREET PAWTUCKET	02120 Med. Institution - QMP Req.	3	11-Jan-00	10-Jan-03	01-Mar-03		DK	PREP 3-4 Nov, INSPECT 6 Nov 03, FINAL REPORT 13 Nov 03
3E-100-01	RHODE ISLAND BLOOD CENTER	405 PROMENADE STREET Providence	03510 Irrad. Self-Shield < 370 TBq	5	14-Apr-94	13-Apr-99	13-Apr-01	25-Aug-03	CC-JF	AVAILABILITY
3K-023-01	RI PSYCHIATRIC RESEARCH	PO BOX 8269 GEN HOSPITAL Cranston	03620 Research/Dev Other	5	9-Jan-91	8-Jan-96	08-Jan-98	28-Aug-03	JF	LICENSEE SUBMITTED MAT-7 TERMINATION REQUEST- ON SITE VISIT TO ADDRESS AGENCY CONCERNS RE WASTE
3L-070-01	J. H. LYNCH & SONS	50 LYNCH PLACE CUMBERLAND	03121 Meas Sys Port Gauge inc Lixiscop	5	17-Feb-92	15-Feb-97	15-Feb-99	26-Aug-03	CC	PREP 18 AUG 03, INSPECT 20 AUG, FINAL REPORT 26 AUG 03
3L-096-01	PROFESSIONAL SERVICE INDUSTRIES INC.	510 EAST 22ND STREET LOMBARD IL	03121 Meas Sys Port Gauge inc Lixiscop	5	6-Apr-93	5-Apr-98	05-Apr-98		CC	PREP 22 Sept 03. INSPECT 24 Sept 03, FINAL REPORT 29 Sept 03

ATTACHMENT B: INSP-TIMELINE 03

7B-091-01	FORTUNATO, M.D., BRANNON, MD & TILKEMEIER, MD	1524 ATWOOD AVE-SUITE 345 JOHNSTON	02201 Med. Private Prac. - no QMP Req.	5	30-Mar-92	29-Mar-97	29-Mar-99		JF-CC	22Oct prep, inspect 23 Oct final 28 Oct 03
7B-109-01	NAVIX DIAGNOSTIX, INC.	100 MYLES STANDISH BLVD TAUNTON MA	02201 Med. Private Prac. - no QMP Req.	5	4-May-94	3-May-99	3-May-01		JF-CC	22Oct prep, inspect 23 Oct final 28 Oct 03
8A-009-01	RI EMERGENCY MANAGEMENT AGENCY	645 NEW LONDON AVENUE CRANSTON	03710 Civil Defense	5	14-Aug-90	13-Aug-95	13-Aug-97		CC	Availability Oct- Nov
8A-009-02	RI EMERGENCY MANAGEMENT AGENCY	645 NEW LONDON AVENUE CRANSTON	03710 Civil Defense	5	14-Aug-90	13-Aug-95	13-Aug-95		CC	Availability Oct- Nov
3L-057-01	RI DEPT OF HEALTH LABORATORY	50 ORMS STREET Providence	03124 Measuring Systems - Other	7	4-Jun-91	2-Jun-98	02-Jun-98		DK	

1 ** Inspection /annual frequency was due at least by August 03, items /02 inspection were self identified and resolved per inspection date.

Interim visit limited to selective items

Inspections completed (shaded)

Complaint referenced delivery practices at Westerly Hospital-complaint accusations were found to be unsupported.

