

March 2, 2004

Mr. Aubrey Godwin, Director
Arizona Radiation Regulatory Agency
4814 South 40th Street
Phoenix, AZ 85040

Dear Mr. Godwin:

I am responding to your February 13, 2004 e-mail to me in which you raised several issues with the Commission paper dated December 19, 2003 on options for the Five-Week Health Physics Course. The issues you raised were based on the second paragraph on page 3, which you believe overlooks the following very important points in responding to a radiological dispersal device (RDD) or an improvised nuclear device (IND) events.

1. It assumes that State Radiological Agencies are the first responders to such events. Actually they are the first support responders to these events. The Police, Fire, Bomb or Hazmat teams typically arrive prior to the Radiological Agency. They will identify the possible RDD or IND and ask for assistance. The Radiological Agency then supports these teams as health physicists. They will bring to bear isotopic identification equipment and dose assessment expertise, not available to first responders. I know of no state who would want the true first responders to go to the five-week course, on the other hand, I suspect most State Radiological Agencies would like their responding health physicists to have that type of training.

Response: The NRC staff in their analysis knew that the Radiological Agency staff are not the first (initial) responders to incidents (RDDs and INDs). The staff also considered that the Radiological Agency staff provide a vital role after the initial evaluation is made that there is a radiological hazard involved (As you stated, they support responders). The staff analysis was based on the assumption that State Radiological Agency staff would have training equivalent to the five-week course as a minimum health physics knowledge base to work in the radiological regulatory program. Your e-mail indicates that you agree that the five-week health physics course is not appropriate for first (initial) responders.

2. Secondly, this paragraph fails to note how critical it is for the states to have this training. U.S. DOE has indicated to us that if more than two major events occur at the same time, they will not be able to fully support the response to them. The states thus are forced to assume that DOE health physics support may not be available and therefore must have some reasonable capability in house. The five-week course is a major part of that capability that a state will need. The FEMA courses are geared to disaster event and the first responder level of training. Some are somewhat advanced but are limited to semi-rote response to particular types of events. At present, none of the training addresses some of the issues we have found working with the Bomb Squads. The five-week course did give us the ability to understand the potential problems related to contamination, decontamination and plume tracking.

Response: As stated above and in the paper, the staff does believe the knowledge base in the five-week course is a necessary minimum knowledge base for staff working as Radiological Agency staff (health physicists). The question in the paper was not the level of training expected to conduct the regulatory program, but whether the NRC could justify purchasing an entire course given the expense and limited attendance in the course. The most cost effective method of purchasing the course is on a space-by-space basis. The Commission agreed with the staff analysis. Since the five-week course is available from two vendors, the NRC Offices and the States will need to individually contract with one or both of the vendors for space in the commercially available courses.

3. Attachment 3 to that paper clearly indicates that the staff was thinking of the true first responders when they made their recommendations to the Commission. It is regretful that no one was available to point out the different response made by the Radiological Agencies and how critical their support will be in an emergency or an RDD event. The Radiological Agencies will almost always be at the scene when the Federal response arrives often giving the impression they are first responders. They are what make first responders effective by providing prompt effective health physics support to the event.

I suggest a re-evaluation of this paper in light of these facts. Aubrey Godwin

Response: The staff and the Commission are aware that State staff respond to events in their respective States even when the event involves NRC licensed material as well as potential malevolent use of radioactive material such as RDD or IND events. The question addressed in the paper was, "Is the five-week course appropriate for first (initial) responders to RDD or IND events?" We believe the paper accurately answered that question. As you indicated in your first comment above, you agree that a five-week course is not necessary for first responders, but that it is appropriate for health physics staff in the State regulatory programs which support the initial responders when a radiological hazard is identified.

Since the facts that you discuss were considered by the staff in the preparation of the paper and the staff believes that the Commission also is aware of this information, we do not plan to re-evaluate the paper.

However, in addition to the above issues raised in your e-mail, we previously discussed by telephone the need for funding support to provide health physics training (i.e., the five-week course) for State Radiation Control Agency staff to ensure a sufficient number of qualified State staff are available to provide health physics support to first responders. We also discussed whether Federal funding for health physics training of State personnel might be available through another Federal agency such as the Department of Homeland Security (DHS). We plan as a part of routine interactions with DHS to discuss the issue of Federal funding support for health physics training with appropriate DHS staff. You may also want to share this issue with CRCPD and OAS leadership for their consideration in seeking DHS or other Federal funding support for State health physics training.

Aubrey Godwin

- 3 -

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If you have any additional questions on this issue, please contact me at 301-415-3340 or Dennis Sollenberger at 301-415-2819.

Sincerely,

/RA By Josephine M. Piccone Acting for/
Paul H. Lohaus, Director
Office of State and Tribal Programs

Aubrey Godwin

- 3 -

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