

INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM

QUESTIONNAIRE

Name of State Program: Kentucky  
Reporting Period: July 22, 2000 to July 23, 2004

**A. COMMON PERFORMANCE INDICATORS**

**I. Status of Materials Inspection Program**

1. Please prepare a table identifying the licenses with inspections that are overdue by more than 25% of the scheduled frequency set out in NRC Inspection Manual Chapter 2800. The list should include initial inspections that are overdue.

#	Licensee Name	Priority	Next Insp. Due	Months O/D
202-274	PET SCANS OF AMERICA	4	05-Apr-2002	27
201-658	CBC ENGINEERS & AFFILIATES LLC	4	17-Jul-2002	24
201-228	KENTUCKY PROCESSING COMPANY	4	27-Aug-2002	23
202-285	LEXINGTON CLINIC EAST	4	17-Oct-2002	21
202-289	LIFESCAN AMERICA	4	30-Nov-2002	20
201-664	NEW RIDGE MINING	4	31-Jan-2003	18
201-056	WEST KENTUCKY WELL SURVEYS	3	03-Mar-2003	16
202-238	SCINTIPHARMA INC	3	09-May-2003	14
202-294	JEWISH HOSPITAL MEDICAL CENTER	3	21-May-2003	14
202-255	MOLECULAR IMAGING CORPORATION	3	21-Jun-2003	13
201-498	ARCH COAL TERMINALS INC.	5	23-Jun-2003	13
201-671	CHEMPHARMA INT'L., LLC	3	10-Jul-2003	12
202-297	ASHLAND BELLEFONTE CANCER CNTR	3	06-Aug-2003	11

<sup>1</sup> Estimated burden per response to comply with this voluntary collection request: 53 hours. Forward comments regarding burden estimate to the Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0183), Office of Management and Budget, Washington, DC 20503. If an information collection does not display a currently valid OMB control number, NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

202-197	CBA INTERNATIONAL INC	307-Sep-2003	10
202-117	BAPTIST HOSPITAL EAST	330-Sep-2003	10
202-204	CARDINAL HEALTH	114-Oct-2003	9
202-221	RADIOPHARMACY OF PADUCAH INC	121-Oct-2003	9
202-206	CARDINAL HEALTH	128-Jan-2004	6

2. Do you currently have an action plan for completing overdue inspections? If so, please describe the plan or provide a written copy with your response to this questionnaire.

Each inspector has been tasked with completing a minimum of 4 inspections per month with the priority given to those that are past due. This will make us current by the end of January 2005.

3. Please identify individual licensees or groups of licensees the State/Region is inspecting more or less frequently than called for in NRC Inspection Manual Chapter 2800 and state the reason for the change.

No licensees or groups of licensees are inspected less frequently than called for in NRC Inspection Manual Chapter 2800. Some licensee groups are inspected more frequently than specified in the manual such as Private Practice Medical (no QMP required), Mobile Medical, and Portable Gauge users. The increased frequency is due to the observation of previous personnel that, for these particular groups, reducing the time between inspections results in fewer and less significant violations.

4. Please complete the following table for licensees granted reciprocity during the reporting period.

Priority	Number of Licensees Granted Reciprocity Permits Each Year	Number of Licensees Inspected Each Year
Service Licensees performing teletherapy and irradiator source installations or changes	2001 YR ? 2002 YR 2 2003 YR 3 2004 YR 3	2001 YR 0 2002 YR 1 2003 YR 2 2004 YR 1
1	2001 YR ? 2002 YR 9 2003 YR 7 2004 YR 8	2001 YR 0 2002 YR 1 2003 YR 3 2004 YR 2
2	2001 YR 0 2002 YR 0 2003 YR 0 2004 YR 0	2001 YR 0 2002 YR 0 2003 YR 0 2004 YR 0

Priority	Number of Licensees Granted Reciprocity Permits Each Year	Number of Licensees Inspected Each Year
3	2001 YR ? 2002 YR 6 2003 YR 7 2004 YR 2	2001 YR 0 2002 YR 0 2003 YR 0 2004 YR 0
4	2001 YR ? 2002 YR 31 2003 YR 31 2004 YR 22	2001 YR 0 2002 YR 5 2003 YR 6 2004 YR 0
All others	2001 YR ? 2002 YR 17 2003 YR 11 2004 YR 14	2001 YR 0 2002 YR 1 2003 YR 2 2004 YR 1

5. For NRC Regions, did you establish numerical goals for the number of inspections to be performed during this review period? If so, please describe your goals, the number of inspections actually performed, and the reasons for any differences between the goals and the actual number of inspections performed.

N/A

## II. Technical Quality of Inspections

6. What, if any, changes were made to your written inspection procedures during the reporting period?

The inspection Manual, Section 201, was revised to ensure that core licenses authorizing the conduct of activities from multiple permanent field offices are inspected at the same frequency as specified by the NRC Inspection Manual.

7. Prepare a table showing the number and types of supervisory accompaniments made during the review period. Include:

<u>Inspector</u>	<u>Supervisor</u>	<u>License Cat.</u>	<u>Date</u>
Rick Horky	Robert Johnson	Medical	03/09/04
Steven Berrier	Robert Johnson	Laboratory	01/15/04

Observation of Robert Gresham is scheduled for the week of July 12, 2004. Matthew McKinley will be observed later this year based on qualification progress.

7. Describe internal procedures for conducting supervisory accompaniments of inspectors in the field.

Each inspector will be observed and evaluated at least annually.

9. Describe or provide an update on your instrumentation and methods of calibration. Are all instruments properly calibrated at the present time? Were there sufficient calibrated instruments available through the review period?

We have numerous instruments that are out of use and consequently not calibrated, the instruments that are used are as follows:

<u>Instrument</u>	<u>Serial Number</u>	<u>Calibration Date</u>
Canberra Inspector 1000	12036370	
Exploranium	9833	4/26/05
Ludlum 2241-2	182188	4/26/05
Ludlum 2241-2	166941	5/3/05
Ludlum 2241-2	176306	11/10/04
Ludlum 2241-2	176294	11/16/04
Ludlum 2241-2	176300	5/6/04*
Ludlum 2241-2	174178	8/26/04
Ludlum 2241-2	174176	8/7/04
SAIC PD-1	BB0978	4/23/05
SAIC PD-1	BA1376	4/23/05
ESP-1/NRD	567/C4724	4/29/05
Radiation Alert Inspector	10662	3/31/05
Radiation Alert Inspector	10663	3/31/05
Radiation Alert Inspector	10664	3/31/05
Radiation Alert Inspector	10665	3/31/05
Radiation Alert Inspector	10666	3/31/05
Ludlum 14C	110466	11/13/04
Ludlum 14C	110376	12/27/02*
Ludlum 14C	116054	8/2/03*
Ludlum 14C	116034	1/2/03*
Ludlum 14C	116001	1/2/03*

**\*Out of Service for Calibration or Repair**

III. Technical Staffing and Training

10. Please provide a staffing plan, or complete a listing using the suggested format below, of the professional (technical) person-years of effort applied to the agreement or radioactive material program by individual. Include the name, position, and, for Agreement States, the fraction of time spent in the following areas: administration, materials licensing & compliance, emergency response, LLW, U-mills, other. If these regulatory responsibilities are divided between offices, the table should be consolidated to include all personnel contributing to the radioactive materials program. Include all vacancies and identify all senior personnel assigned to monitor work of junior personnel. If consultants were used

to carry out the program's radioactive materials responsibilities, include their efforts. The table heading should be:

<u>Name</u>	<u>Position</u>	<u>Area of Effort</u>	<u>FTE%</u>
Matthew McKinley	Supervisor, Radioactive Materials	Administrative	80%
		Licensing/Compliance	20%
Rick Horkey	Radioactive Materials Specialist IV	Licensing/Compliance	80%
		Administration	10%
		Emergency Response	10%
Steven Berrier	Radioactive Material Specialist III	Licensing/Compliance	40%
		Reciprocity	30%
		Transportation	20%
		Emergency Response	10%
Robert Gresham	Radioactive Material Specialist III	Licensing/Compliance	80%
		SSED	10%
		Emergency Response	10%
Robert L. Johnson	Manager, Radiation Health	Administration of Materials	
		Program	15%
		Emergency Response	15%
		LLW	5%
		Paducah Gaseous Diffusion	
		Plant	5%
		Licensing/Compliance	40%
		Martha Oil Fields	10%
		Other Program Areas	
		(e.g., x-ray, etc.)	10%

11. Please provide a listing of all new professional personnel hired since the last review, indicate the degree(s) they received, if applicable, and additional training and years of experience in health physics, or other disciplines, if appropriate.

<u>Name</u>	<u>Degree</u>	<u>Years Experience</u>	<u>Additional Training</u>
Rick Horkey	none	12	Army Health Physics NRC Courses
Steven Berrier	B.S. Hazardous Material		5 NRC Licensing Inspection Transportation Radiography Well Logging
Robert Gresham	none		3 Naval Nuclear Power NRC Licensing Inspection Well Logging

Matt McKinley	none	6	Naval Nuclear Power NRC Radiography
Robert Johnson	B.S. Human Resources	32	Naval Nuclear Power NRRPT Registry NRC Courses

12. Please list all professional staff who have not yet met the qualification requirements of license reviewer/materials inspection staff (for NRC, Inspection Manual Chapters 1246; for Agreement States, please describe your qualifications requirements for materials license reviewers and inspectors). For each, list the courses or equivalent training/experience they need to attend and a tentative schedule for completion of these requirements.

Matt McKinley: Fixed Gauge, Portable Gauge, Industrial Radiography, Well-Logging. Completion based on OJT availability.

Steve Berrier: Diagnostic Medical, Radiopharmaceutical Therapy, Brachytherapy, HDR, Gamma Knife. Completion based on OJT availability.

Rob Gresham: Industrial Radiography, Well-Logging. Completion based on OJT availability.

The qualification process is designed to ensure that an employee has achieved and demonstrated a thorough understanding of a given area of expertise prior to functioning independently in that area. The specific areas of expertise as indicated on the training qualification form are as follows:

- Fixed Gauge
- Portable Gauge
- Diagnostic Medical
- Radiopharmaceutical Therapy
- Brachytherapy
- HDR
- Gamma Knife
- Industrial Radiography
- Well-Logging
- Academic / Research
- Other Laboratories

An employee is considered to be qualified in a given area only after management has signed the official copy of the training qualification form found in the RMS training binder. Qualification in an area enables an employee to work independently in taking appropriate and necessary licensing actions and inspecting and evaluating licensees in that area.

Although it is preferred that an employee attend the corresponding training course prior to qualification in a specific area, it is understood that this is not always feasible. As a

result, an in-house and on-the-job training program has been implemented to expedite the qualification of the employee. This program is a teaching and evaluation process in which an unqualified staff member works with qualified staff members until he/she has demonstrated a level of competence in both licensing actions and inspections.

The complexity and length of this process will vary between employees and between areas of qualification.

13. Please identify the technical staff who left the RCP/Regional DNMS program during this period.

Dr. John Volpe, Vicki D. Jeffs, Michael Cleaver, Jan Jasper, and Ed Lohr

14. List the vacant positions in each program, the length of time each position has been vacant, and a brief summary of efforts to fill the vacancy.

An existing vacancy in the Materials Program for a Radioactive Materials Specialist IV has existed since the transfer of Ms. Jasper in September 2003. That position is to be filled with a Specialist III in September 2004, as interviews have been conducted. Mr. Johnson filled a vacancy in the Materials Branch Manager position in November 2002 after Dr. John Volpe's retired in June 2002. The Materials Supervisor position was vacated twice, once in July 2001 upon retirement of Ms. Jeffs, and again in April 2002 upon transfer of Mr. Lohr. Mr. Lohr filled the supervisors position in October 2001, which was then subsequently filled by Mr. McKinley in August 2003. Mr. Horky filled a vacant Radioactive Materials Inspector III position vacated by Mr. Cleaver in October 2000, and Mr. Berrier filled a vacant Radioactive Materials Inspector III position vacated by Mr. Lohr in October 2001.

#### IV. Technical Quality of Licensing Actions

15. Please identify any major, unusual, or complex licenses which were issued, received a major amendment, were terminated, decommissioned, submitted a bankruptcy notification or renewed in this period. Also identify any new or amended licenses that now require emergency plans.

Maxey Flats (license number 206-002-03) underwent a major amendment revision in 2003.

16. Discuss any variances in licensing policies and procedures or exemptions from the regulations granted during the review period.

None granted

17. What, if any, changes were made in your written licensing procedures (new procedures, updates, policy memoranda, etc.) during the reporting period?

No changes

18. For NRC Regions, identify by licensee name, license number and type, any renewal applications that have been pending for one year or more. Please indicate why these reviews have been delayed.

N/A

V. Responses to Incidents and Allegations

19. For Agreement States, please provide a list of the reportable incidents (i.e., medical misadministration, overexposures, lost and abandoned sources, incidents requiring 24 hour or less notification, etc. See Handbook on Nuclear Material Event Reporting in Agreement States for additional guidance.) that occurred during the review period. Information included in previous submittals to NRC need not be repeated (i.e., those submitted under OMB clearance number 3150-0178, Nuclear Material Events Database). The list should be in the following format:

<u>Licensee Name</u>	<u>License #</u>	<u>Date of Incident/Report</u>	<u>Type of Incident</u>
N/A			

20. During this review period, did any incidents occur that involved equipment or source failure or approval operating procedures that were deficient? If so, how and when were other State/NRC licensees who might be affected notified? For States, was timely notification made to NRC? For Regions, was an appropriate and timely PN generated?

N/A

21. For Agreement States, for incidents involving failure of equipment or sources, was information on the incident provided to the agency responsible for evaluation of the device for an assessment of possible generic design deficiency? Please provide details for each case.

N/A

22. Identify any changes to your procedures for handling allegations that occurred during the period of the review.

No change

VI. General

23. Please prepare a summary of the status of the State's or Region's actions taken in response to the comments and recommendations following the last review. Describe the results of any program audit completed during the review period.

1. The review team recommends that the Branch revise their inspection manual to ensure that core licenses authorizing the conduct of activities from multiple permanent field offices are inspected at the same frequency as specified in IMC 2800. (Section 3.1)  
This has been accomplished.
2. The review team recommends that the Branch ensure that reciprocity licenses are inspected in accordance with the frequency criteria specified in the Branch's inspection manual. (Section 3.1)

The Branch has made this area a priority as a result of the IMPEP recommendation. Consistent progress has been made and it is anticipated that all required inspections will be conducted this year.

3. The team recommends that the Branch revise their training program to include documentation of staff's equivalent training and experience in lieu of completing a required basic training course, including supervisory sign off for each completed area of training. (Section 3.3)

This has been accomplished.

4. The team recommends that the Branch commit the necessary resources to complete all the SS&D registry re-evaluations prior to the next IMPEP review period. (Section 4.2.1)

Due to significant effort and follow up by Branch personnel, all applicable registrations have been received (as of May 26, 2004) and are awaiting review.

24. For NRC Regions, briefly describe any recent efforts, or future plans, on your part to: (1) improve the safety performance of licensees operating below acceptable levels for ensuring public health and protection, (2) increase the public confidence in your program, (3) increase your effectiveness, and efficiency, or (4) reduce any unnecessary regulatory burden for your stakeholders.

N/A

25. Provide a brief description of your program's strengths and weaknesses. These strengths and weaknesses should be supported by examples of successes, problems or difficulties which occurred during this review period.

#### Weaknesses

- Staff turnover has continued to be a significant problem for the program. There was no supervisor within the materials program for a period of 17 months. During that same period the Branch Managers position was vacant for a period of 4 months.
- IMPEP reviews since the early 1990's have commented on the Materials Program being understaffed. The total number of licensee's have increased since that time from 400 to over 700, yet the staff level maintained has not changed. In fact, due to attrition, staffing levels have often been lower than

previously identified deficient levels. Compared to adjacent agreement and NRC regulated states based on the number of licensee's, Kentucky Materials Program is 75 % understaffed. When referencing the NRC's recommended staffing of 1 to 1.5 staff per 100 licensees, Kentucky is understaffed nearly 60 %.

- Salary levels continue to be low relative to other Agreement and NRC states. Kentucky's salaries are the lowest in the continental United States, only to exceed Puerto Rico's salaries when compared to all regulatory Materials Programs. This has limited the ability to hire degreed or experienced professionals.
- Program Fees although raised in November 2003, remain significantly below other agreement states and that needed to fully support the program.
- Actual experience of the Materials Program staff on a regulatory issues has gone from 64 years to 9 years since last IMPEP.

#### Strengths

- New Staff remain enthusiastic and program changes are starting to take place. A Training Program has been implemented in effort to offset the ability to hire degreed individuals.
- Division Management has been cooperative in approving an additional staff position in 2002. Unfortunately, due to state wide hiring freezes and attrition, the Branch has been unable to retain this position.

## B. NON-COMMON PERFORMANCE INDICATORS

### I. Legislation and Program Elements Required for Compatibility

26. Please list all currently effective legislation that affects the radiation control program (RCP).

Current Effective Legislation for the Radiation Health & Toxic Agents Branch are Kentucky Revised Statutes (KRS) 13B.170, 194A.050, 211.090, 211.842 to 211.852, 211.859, 211.990 (4), and KRS 211.861 to 211.869. Regulations for radioactive material are located in Administrative 902 Kentucky Administrative Regulations (KAR) Chapter 100.

27. Are your regulations subject to a "Sunset" or equivalent law? If so, explain and include the next expiration date for your regulations.

Our regulations are not subject to a "sunset law"

28. Please complete the enclosed table based on NRC chronology of amendments. Identify those that have not been adopted by the State as detailed in the current RATS form, explain why they were not adopted, and discuss any actions being taken to adopt them. Identify the regulations that the State has adopted through legally binding requirements other than regulations.

See Table

29. If you have not adopted all amendments within three years from the date of NRC rule promulgation, briefly describe your State's procedures for amending regulations in order to maintain compatibility with the NRC, showing the normal length of time anticipated to complete each step.

The process of amending regulations includes the following steps:

<u>Step</u>	<u>Time to accomplish</u>
1. Drafting the amendment	3 months
2. Cabinet amendment review	3 months
3. Cabinet review and approval	3 months
4. Public Review	2 months
5. Respond to public comments	3 months
6. Presentation to the Legislature	3 months

II. Sealed Source and Device Program

30. Prepare a table listing new and revised SS&D registrations of sealed sources and devices issued during the review period. The table heading should be:

<u>SS&amp;D Registry Number</u>	<u>Manufacturer, Distributor or Custom User</u>	<u>Product Type or Use</u>	<u>Date Issued</u>	<u>Type of Action</u>
KY-0576-D-101-B	Ronan Engineering	Gamma Gauge	1-17-03	Entirety
KY-0576-D-113-B	Ronan Engineering	Gamma Gauge	5-30-02	Entirety
KY-0576-D-114-B	Ronan Engineering	Gamma Gauge	8-03-03	Entirety

31. What guides, standards and procedures are used to evaluate registry applications?

NUREG – 1556, vol-3, rev-1  
ANSI N 43.8-1979  
ISO 7205-1986(e)  
Reg. Guide 6.9  
Applicable NCRP Reports  
SS&D course material applicable to the review

32. Please include information on the following questions in Section A, as they apply to the Sealed Source and Device Program:

Technical Staffing and Training - A.III.10-14

<u>Name</u>	<u>Position</u>
Bob Johnson	Branch Manager
Rob Gresham	Radioactive Materials Specialist-III

Rick Horky                      Radioactive Materials Specialist-IV

Personnel performing registry reviews have attended the NRC Sealed Source & Device Workshop. Personnel without this training are not involved in this review process.

Technical Quality of Licensing Actions - A.IV.15-18

N/A

Responses to Incidents and Allegations - A.V.19-22

N/A

III.     Low-Level Waste Program

33.     Please include information on the following questions in Section A, as they apply to the Low-level Waste Program:

N/A

Status of Materials Inspection Program - A.I.1-3, A.I.5

Technical Quality of Inspections - A.II.6-9

Technical Staffing and Training - A.III.10-14

Technical Quality of Licensing Actions - A.IV.15-18

Responses to Incidents and Allegations - A.V.19-22

IV.     Uranium Mill Program

34.     Please include information on the following questions in Section A, as they apply to the Uranium Mill Program:

N/A

Status of Materials Inspection Program - A.I.1-3, A.I.5

Technical Quality of Inspections - A.II.6-9

Technical Staffing and Training - A.III.10-14

Technical Quality of Licensing Actions - A.IV.15-18

Responses to Incidents and Allegations - A.V.19-22

10 CFR RULE	DATE DUE	DATE ADOPTED OR EFFECTIVE	OR	
			CURRENT STATUS	EXPECTED ADOPTION
Any amendment due prior to 1993. Identify each regulation (refer to the Chronology of Amendments)	N/A		All Adopted	
Emergency Planning; Parts 30, 40, 70	4/7/93	4/94		
Standards for Protection Against Radiation; Part 20	1/1/94	4/11/94		
Safety Requirements for Radiographic Equipment; Part 34	1/10/94	4/11/94		
Notification of Incidents; Parts 20, 30, 31, 34, 39, 40, 70	10/15/94	4/19/95		
Quality Management Program and Misadministrations; Part 35	1/27/95	4/11/95		
Licensing and Radiation Safety Requirements for Irradiators; Part 36	7/1/96		Not Applicable SECY-95-112	
Definition of Land Disposal and Waste Site QA Program; Part 61	7/22/96		Not Applicable SECY-95-112	
Decommissioning Recordkeeping: Documentation Additions; Parts 30, 40, 70	10/25/96	4/19/95		
Uranium Mill Tailings: Conforming to EPA Standards; Part 40	7/1/97		Not Required	
Timeliness in Decommissioning Parts 30, 40, 70	8/15/97	8/20/97		
Preparation, Transfer for Commercial Distribution, and Use of Byproduct Material for Medical Use; Parts 30, 32, 35	1/1/98	8/20/97		
Frequency of Medical Examinations for Use of Respiratory Protection Equipment	3/13/98	1/14/97		
Low-Level Waste Shipment Manifest Information and Reporting	3/1/98	5/94		
Performance Requirements for Radiography Equipment	6/30/98	4/19/95		

10 CFR RULE	DATE DUE	DATE ADOPTED OR EFFECTIVE	OR	
			CURRENT STATUS	EXPECTED ADOPTION
Radiation Protection Requirements: Amended Definitions and Criteria	8/14/98	9/11/00		
Medical Administration of Radiation and Radioactive Materials.	10/20/98	5/97		
Clarification of Decommissioning Funding Requirements	11/24/98	9/11/00		
10 CFR Part 71: Compatibility with the International Atomic Energy Agency	4/1/99		6/21/00 NRC Comments	
Termination or Transfer of Licensed Activities: Recordkeeping Requirements.	6/16/99	9/11/00		
Resolution of Dual Regulation of Airborne Effluents of Radioactive Materials; Clean Air Act	1/9/2000	11/14/97		
Recognition of Agreement State Licenses in Areas Under Exclusive Federal Jurisdiction Within an Agreement State	2/27/2000	2/2/01		
Criteria for the Release of Individuals Administered Radioactive Material	5/29/2000	11/14/97		
Licenses for Industrial Radiography and Radiation Safety Requirements for Industrial Radiography Operations; Final Rule	6/27/2000	2/2/01		
Radiological Criteria for License Termination	8/20/2000	9/11/00		
Exempt Distribution of a Radioactive Drug Containing One Microcurie of Carbon-14 Urea	1/2/2001	11/14/97		
Deliberate Misconduct by Unlicensed Persons	2/12/2001	10/16/00		
Licenses for Industrial Radiography and Radiation Safety Requirements for Industrial Radiographic Operations; Clarifying Amendments and Corrections	7/9/2001	2/2/01		
Minor Corrections, Clarifying Changes, and a Minor Policy Change	10/26/2001		Placed on project schedule for accomplishment fall 2005	
Transfer for Disposal and Manifest; Minor	11/20/2001		Adams ML020420112, Reviewed no comments 2/2/01	

10 CFR RULE	DATE DUE	DATE ADOPTED OR EFFECTIVE	OR	
			CURRENT STATUS	EXPECTED ADOPTION
Technical Conforming Amendments				
Radiological Criteria for License Termination of Uranium Recovery Facilities	6/11/2002		Not Applicable	
Respiratory Protection and Controls to Restrict Internal Exposures	2/2/2003		Placed on project schedule for accomplishment fall 2005	
Energy Compensation Sources for Well Logging and Other Regulatory Clarifications	5/17/03		Placed on project schedule for accomplishment fall 2005	
New Dosimetry Technology	1/8/04		Placed on project schedule for accomplishment fall 2005	