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Colorado Department
of Public Health
and Environment

May 18, 2006

Lloyd A. Bolling, Health Physicist
Office of State and Tribal Programs
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Draft Report on the Colorado
Integrated Materials Performance Evaluation Program

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Dear Mr. Bolling:

We have reviewed the U.S. Nuclear Regulatory Commission's (NRC's) draft Integrated Materials Performance Evaluation Program (IMPEP) report for Colorado based on the review conducted in Colorado on March 13-17, 2006. We find the report accurately reflects the review process conducted for the State of Colorado radioactive materials program. We have no corrections or changes to suggest at this time.

You requested that we respond to the four recommendations listed in the report. Our initial responses are provided below for your consideration:

1. The review team recommends the Program conduct reciprocity inspections in accordance with the criteria outlined in NRC MC 1220. (Section 3.2)

Response: The Inspection Team has discussed methods for more frequent tracking of reciprocity inspections at Inspection Team meetings on April 3, 2006 and May 9, 2006, and expects to develop a process description this summer as part of the Inspection Manual revision. Meanwhile, the Unit Leader and Inspection Lead are developing an assignment strategy to identify higher priority reciprocity inspection targets, which should be in place within a few weeks.

2. The review team recommends that the Program develop and implement a process for issuance of provisional licenses in a timely manner as well as timely termination of these licenses. (Section 3.4)

Response: Development of a provisional license process description was discussed and assigned to a staff member at our March 24, 2006 Licensing Team meeting. This information will be added to a broader licensing process description we expect to complete this summer.

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3. The review team recommends that the Program add a section to the two-page reviewer checklist to facilitate the appropriate, thorough and consistent review of license decommissioning and terminations items. (Section 3.4)

Response: Decommissioning and license termination requirements and documentation were discussed at our March 24, 2006 Licensing Team meeting. We determined that the license reviews and the license process documentation will include more specific information on these issues. In addition, we have already initiated a process as part of license review docketing to copy termination requests upon receipt to the Inspection Lead for consideration of a closeout inspection or survey concurrent with the licensing activity. We will consider the recommendation to add information to our reviewer checklist to ensure the additional information is included.

4. The review team recommends that the Program transfer six sealed source and device certificates to inactive status, because their original manufacturers are no longer in business. (Section 4.2.2)

Response: This recommendation was discussed at our March 24, 2006 Licensing Team meeting and agreement was reached to incorporate this into the licensing process documentation by this summer. Specific file reviews have not been assigned, but will be implemented in the near future.

We will provide updates to our progress on these recommendations at the annual program review meetings or as appropriate.

I would like you to know that Colorado staff involved in the IMPEP review were extremely complimentary of the NRC and Agreement State staff conducting the review. Most of our staff found the experience challenging, but surprisingly enjoyable and a good learning experience. They noted that your reviewers were knowledgeable, extremely thorough, pleasant to work with, and genuinely interested in our program and in identifying potential improvements. As a result of this interaction, we have already implemented many of the ideas identified during the review which we believe add value to our program.

We appreciate the effort you have put into this process. We will be contacting you soon to determine the logistics for either sending a representative to the Management Review Board meeting and/or setting up participation through videoconferencing capabilities. Should you have any questions or additional comments, please contact me at 303-692-3338 or Joe Vranka at 303-692-3402.

Sincerely,



Gary W. Baughman, Director
Hazardous Materials and Waste
Management Division

CC: Joseph Vranka
Steve Tarlton