Approved by OMB[1]
No. 3150-0183
Expires 5/31/07

INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM

QUESTIONNAIRE

Name of State: Oklahoma
Reporting Period: July, 2002, to May, 2006

Note: If there has been no change in the response to a specific question since the last IMPEP questionnaire, the State or Region may copy the previous answer if appropriate. Please note that previous IMPEP questionnaires responses can be found on the STP webpage.

A. COMMON PERFORMANCE INDICATORS

I. Technical Staffing and Training

1. Please provide the following organization charts, including names and positions:

(a) A chart showing positions from Governor down to Radiation Control Program Director;

Response: Governor–Brad Henry

Environmental Quality Board–Steve Mason, Chair
(note that the EQB hires and fires the Executive Director of the agency, but is not involved in agency operations)

Steve Thompson, Executive Director, DEQ

Scott Thompson, Division Director, Land Protection Division

Mike Broderick, Environmental Programs Manager, Radiation Management Section

(b) A chart showing positions of current radiation control program including management; and

Response: See Attachment 1

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[1] Estimated burden per response to comply with this voluntary collection request: 53 hours. Forward comments regarding burden estimate to the Records Management Branch (T-5 F52), 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.

(c) Equivalent charts for sealed source and device, low level radioactive waste and uranium recovery programs, if applicable

Response: Not applicable

2. 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:

Response:

Name	Position	Area of Effort	FTE%
Mike Broderick	Env Programs Mgr	Administration	85%
Pamela Bishop	Env Programs Spec IV	Tech Supervision	90%
Kevin Sampson	Env Programs Spec III	Licens/Insp/Reciprocity	100%
Mohammed Idrissa	Env Programs Spec III	Inspection/Complaints	100%
Jerry Matthews	Env Programs Spec III	Inspection/Complaints	95%
John Flynn	Env Engineer I	Licens/Insp/Complaints	100%
Patricia Chawla	Env Programs Spec II	Licensing/Inventory	60%
Christina Coffel	Env Programs Spec I	Rad Cert/Inspection	50%
Keisha Cornelius	Env Programs Spec II	Licensing/Inspection	20%
Ralph Johnson	Env Programs Spec II	GL/Insp/Complaints	20%
Dale McHard	Env Engineer, Temp	Rulemaking/RMAC	15%

Currently there are no vacancies.

3. 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.

Response: Personnel hired since 2002:

Kelly Pham	Engineering (BS)	4 years non-HP Engineering experience
Keisha Cornelius	Microbiology (BS)	3 years water quality lab management experience
Christina Coffel	Occupational Safety (BS)	1 year other DEQ experience (waste tire program)
Patricia Chawla	Physics (BS) Environmental Science (MS)	none

Shannon Tilley Biology (BS) none
Environmental Science (approx one year of graduate work)

Note that DEQ is restricted to hiring staff with certain degrees for professional positions. For Engineer positions, a degree in engineering (or closely-allied degree and passing the EIT exam) are required, and for Environmental Programs Specialist positions, a bachelor's degree in a physical, natural, or biological science, chemistry, geology, hydrology, physical geography, epidemiology, environmental science, environmental health; or civil, agricultural, environmental, geological or chemical engineering is required. Thus all professional staff have bachelor's degrees in a scientific field.

4. Please list all professional staff who have not yet met the qualification requirements of license reviewer/materials inspection staff (for NRC, Inspection Manual Chapter (IMC) 1246; for Agreement States, please enclose a copy of your qualification and training procedure. If you do not have a written procedure 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.

Response: We continue to follow the training and qualification procedure described in our agreement state application with some modifications. We have accelerated bringing new staff into doing RAM inspection and licensing work under supervision. This has been successful thus far. We continue to use NRC training courses as qualification requirements (Except the Transportation Course, where we are substituting a DOT radioactive materials transportation course). With the ending of the Five-week Applied Health Physics Course as an NRC-sponsored event, we are now using a similar course operated for the state of Texas in Houston. We continue to have funding to send people to training.

Staff who are not yet fully trained (with estimates of future qualification dates) include:

Ralph Johnson–Completed Basic Radiological Health Course (BHRC) in May 2006, tentative qualification for Basic AEA inspection late 2006, qualification for additional inspection types and/or licensing late 2006 or early 2007.

Keisha Cornelius–Newly-hired, Completed BHRC in May 2006, tentative qualification for Basic AEA inspection and/or licensing end of 2006, qualification for additional inspection and/or licensing end 2007.

Christina Coffel--Newly-hired, Completed BHRC in May 2006, tentative qualification for Basic AEA inspection and/or licensing end of 2006, qualification for additional inspection and/or licensing end 2007.

Patricia Chawla–Completed BHRC in May, 2006, now doing Basic AEA licensing and inspection under supervision, expected qualification for Basic AEA licensing and inspection 2006, qualification for additional licensing and inspection end 2007.

5. Please identify the technical staff who left the Agreement State/Regional DNMS program during this period.

Response: Steve Hoggard, Dutchie Young, Mark Conley, Carlie Nichols, Shannon Tilley, Kelly Pham

6. 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.

Response: There are no vacant positions in the radiation program at this time. The EPS position now occuppied by Keisha Cornelius became vacant and was filled promptly. The Section continues to be able to hire staff and fill vacancies.

7. Does the Agreement State program have an oversight board or committee which provides direction to the program and is composed of licensees and other members of the public? If so, please describe the procedures used to avoid a conflict of interest.

Response: The Section manager and EPS IV work with the Radiation Management Advisory Council (RMAC), a body formed in statute, consisting of representatives of members of the public, environmental groups, RAM users, and other appropriate persons. These people are appointed by the Governor and legislative leaders. The appointing officials usually ask DEQ for recommendations. Note that this is an Advisory Council, and does not actually provide direction to the program. In particular, it has no authority over inspection and enforcement. Besides providing a structured way for the Section to interact with licensees and affected parties, the main function of the RMAC is to recommend proposed rules to the Environmental Quality Board. In theory the Environmental Quality Board could pass rules regarding radiation matters without the recommendation of the RMAC, but in practice they have not done so. In some cases, the EQB declines to approve rules recommended by the RMAC, and sends them back to staff and RMAC for further consideration.

II. Status of Materials Inspection Program

8. Please identify individual licensees or categories of licensees the State/Region is inspecting more or less frequently than called for in IMC 2800 and state the reason for the difference.

Response: None

9. Please provide for the review period, the number of Priority 1, 2, and 3 inspections as identified in IMC 2800 that were completed and the number of initial inspections that were completed.

Response: Priority 1 - 67 Priority 2 - 18; Priority 3 - 78; Initial - 16

10. Please submit a table, or a computer printout, that identifies inspections of Priority 1, 2, and 3 licensees, and initial inspections that are presently overdue or which were conducted at intervals that exceed the IMC 2800 frequencies over the course of the entire review period. (See STP Procedure SA-101, *Reviewing the Common Performance Indicator, Status of Materials Inspection Program*, for detailed guidance in preparing this information).

At a minimum, the list should include the following information for each inspection that is overdue or conducted overdue during the review period:

(1) Licensee Name
(2) License Number
(3) Priority
(4) Last inspection date or license issued date if initial inspection
(5) Date Due
(6) Date Performed
(7) Amount of Time Overdue
(8) Date inspection findings issued

Response: See Attachment 2

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

Response: Oklahoma has no overdue inspections as of the date of this response.

12. Please provide the number of reciprocity licensees that were candidates for inspection per year as described in NRC IMC 1220 and the number of candidate reciprocity inspections that were completed each year during the review period.

Response:

	# of reciprocities	# of inspections completed
2006 (through 5/23)	5	2
2005	35	7
2004	30	10
2003	28	11

III. Technical Quality of Inspections

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

Response: No changes

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

Response:

Inspector	Supervisor	License Category	Date
Idrissa	Broderick	Ind. Rad. Allegation	8/8/2002
Matthews	Broderick	Medical Diagnostic	11/1/2002
Sampson	Broderick	Portable Gauge	11/15/2002
Matthews	Broderick	Portable Gauge	11/5/2003
Sampson	Bishop	Ind. Radiography	8/12/2005
Matthews	Broderick	Medical Diagnostic	12/12/2005
Flynn	Bishop	Well Logging	12/20/2005
Idrissa	Broderick	Medical Diag & Ther	12/28/2005
Matthews	Bishop	Ind. Radiography	5/18/2006
Sampson	Broderick	Ind. Radiography	5/31/2006
Flynn	Broderick	Well Logging	06/28/2006 (scheduled)
Idrissa	Bishop	Medical	July, 2006 (to be scheduled)

Note that due to the limited number of inspections John Flynn does, and the fact that he was accompanied on a well logging inspection in December, 2005, it was not practical to arrange his accompaniment prior to the IMPEP. However, Broderick will accompany him on an inspection of Elite Wireline (a well logging company which had violations leading to a fine on the previous inspection) on June 28, 2006. Bishop will accompany Idrissa in July, 2006. Note that the Program Manager has had an accountability added to his personnel evaluation form requiring him to do these inspections in 2006, and a similar accountability will be included in future years. This will adversely affect his in-agency evaluation with negative effects on eligibility for bonuses or raises in future years if he doesn't conduct these evaluations.

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

Response: All accompaniments are performed by Mike Broderick or Pam Bishop.

Prior to the inspection, the inspector and supervisor should discuss any concerns the inspector has, and in particular any areas or issues the inspector would especially like feedback on. Problems the inspector has encountered can and should be discussed, though care should be taken to maintain a professional, positive, and constructive atmosphere. Similarly, any special strengths of the inspector can and should be discussed. This discussion can take place while traveling to the facility if necessary.

During the inspection, the inspector should have the lead at all times. The supervisor should focus on observing, and should not intervene except to prevent an unsafe situation. In general, the inspector should hold questions for the supervisor until after the inspection is over, though there may be situations where something transient that needs to be observed and pointed out may warrant questions during the inspection.

Immediately after the inspection, the inspector and supervisor should discuss any major issues encountered. This discussion can take place while returning from the facility, but does not replace the more detailed discussion described next.

Each accompaniment is to be followed by a discussion between the inspector and the supervisor about the inspection, inspection methods, what things were done well, and what areas need improvement. This discussion should occur as soon as possible after the inspection, preferably within two business days after return to the office. If the discussion can't take place within one week of inspection completion, another accompaniment should be scheduled. It is much preferred that the discussion take place in person, but if travel status or other conditions make a face-to-face discussion impossible, it may be conducted over the phone. The ability to conduct this discussion in a timely fashion should be considered when scheduling accompaniments. The post-inspection discussion is an important component of accompaniments, and should not be neglected. This is the best opportunity for the inspector to benefit from accompaniments.

Specific issues to be covered during the discussion include:

1) Initial/Exit meetings—The inspector should describe any particular issues with these meetings, including things that went well. The inspector should summarize what preliminary findings were discussed during the exit interview, and either show that all potential violations were discussed in the exit, or else that the facility has been advised of them by a phone call since the inspection.

2) Potential violations uncovered during the inspection. Each one should be listed, and accompanied by a rules citation or license condition that is appropriate for the violation. If there is some reason to doubt that an issue is an actual violation, the inspector should summarize what the issues to be resolved are.

3) The inspector should describe any indicators observed during the inspection that may have warranted further investigation at the time. The inspector should summarize why

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

Response: Presently we have the following instrumentation:

MODEL	MANUFACTURER	TYPE
36155	Keithley	Survey Meter (ion chamber)
36155	Keithley	Survey Meter (ion chamber)
RO-20	Eberline	Ion Chamber
HI-3603	Holaday	Low Frequency EMF Survey Meter
HI-3604	Holaday	Low Frequency EMF Survey Meter
HI-3616	Holaday	Remote Readout
RA-500	NDS	Rate Alarm
RA-500	NDS	Rate Alarm
862	Dos Corp	200 mR Gamma & X-Ray dosimeter
862	Dos Corp	200 mR Gamma & X-Ray dosimeter
H-1500	Holaday	Microwave meter
16	Ludlum	Analyzer (6 mo cal)
44-38	Ludlum	Energy compensated G-M
43-5	Ludlum	Alpha Scintillator
44-2	Ludlum	High Energy Gamma Scintillator
44-9	Ludlum	Pancake G-M detector
44-7	Ludlum	Thin End Window G-M Detector
43-5	Ludlum	Alpha Scintillator
Check Source		CS137 Check Source
H-1500	Holaday	Microwave meter
ND-2000	NDS	Survey Meter (6 mo cal)
862	Dos Corp	200 mR Gamma & X-Ray dosimeter
Check Source		
450P	Victoreen	Pressurized Ion Chamber
SC-MCA512	Quantrad	Scout 512 Portable MCA
SC-GX1	Quantrad	NaI (Tl) 1" X 1" Gamma Probe
HP200LX/SC-LX2	Quantrad	Palm top Computer w ScoutMaster software
S-88-I 2X2	Quantrad	NaI Detector
ND-100	NDS	Dosimeter Charger
The Charger	S.E. Intl.	Dosimeter Charger
RA-500	NDS	Rate Alarm
E-600	Eberline	Portable Radiation Monitor
LEG-1	Eberline	Low Energy Gamma Scintillator

SHP-270	Eberline	Energy compensated G-M
SHP-360	Eberline	Pancake G-M detector
Auto Digi/Master	Xetex	Exposure Ratemeter
16	Ludlum	Analyzer
44-9	Ludlum	Pancake G-M detector
43-5	Ludlum	Alpha Scintillator
44-2	Ludlum	High Energy Gamma Scintillator
Check Source		CS137 Check Source
TFIA	Staplex	High Volume Sampler
TR-1	Staplex	Sampler Tripod
TFIA	Staplex	High Volume Sampler
TR-1	Staplex	Sampler Tripod
CKHV810	Staplex	High Volume Calibration Kit
ND-2000	NDS	Survey Meter (6 mo cal)
W138	ArrowTech	0-200 mR Dosimeter
W138	Arrow Tech	0-200 mR Dosimeter
16	Ludlum	Analyzer
44-9	Ludlum	Pancake G-M detector
43-5	Ludlum	Alpha Scintillator
44-2	Ludlum	High Energy Gamma Scintillator
44-7	Ludlum	Thin End Window G-M Detector
43-5	Ludlum	Alpha Scintillator
3	Ludlum	Survey meter
44-9	Ludlum	Pancake G-M detector
43-5	Ludlum	Alpha Scintillator
44-2	Ludlum	High Energy Gamma Scintillator
44-1	Ludlum	Beta Scintillator
43-2	Ludlum	Alpha Scintillator Detector
16	Ludlum	Analyzer
44-9	Ludlum	Pancake G-M detector
43-5	Ludlum	Alpha Scintillator
44-2	Ludlum	High Energy Gamma Scintillator
44-7	Ludlum	Thin End Window G-M Detector
43-5	Ludlum	Alpha Scintillator
19	Ludlum	MicroR Meter

19	**Ludlum**	**MicroR Meter**
19	**Ludlum**	**MicroR Meter**
12-4	**Ludlum**	**Count Rate Meter (neutrons)**
42-31	**Ludlum**	**Neutron probe**

All intruments are calibrated annually either by Ludlum Instruments, or Thermo Electron except the dosimetry and instruments used during industrial radiography inspections. Pocket dosimeters and Rate Alarms are calibrated annually by Venture Technical Sales & Service, Inc. Venture also calibrates the ND-2000 survey meters, which are calibrated every six months.

There were sufficient calibrated instruments available through the review period.

IV. Technical Quality of Licensing Actions

17. How many specific radioactive material licenses does the Program regulate at this time?

Response: 246

18. 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.

Response: Major, unusual or complex licensing actions are listed in the table below. None of our licenses currently require emergency plans.

Company	License Number	Action Type	Description
Cancer Treatment Centers of America	OK-27041-01	Amendment	Add Y-90 microspheres
Hillcrest Health Center	OK-09206-03	Amendment	Add Ir-192 HDR brachytherapy
Mercy Health Center	OK-07018-03	New License	Gamma Knife
Mercy Health Center	OK-07018-03	Amendment	Add Ir-192 HDR brachytherapy
Saint Francis Health Center	OK-07163-01	Amendment	Add Ir-192 HDR brachytherapy
St. Anthony Hospital	OK-01428-03	Amendment	Add Ir-192 HDR brachytherapy

St. John Medical Center	OK-00376-02	Amendment	Add Ir-192 HDR brachytherapy

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

Response: None

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

Response: Though there have been changes in our licensing procedures due to programmatic changes during the reporting period, written licensing procedures have not been formally updated. Changes in procedure have been handled in our weekly staff meetings and periodic licensing meetings which are held approximately once or twice a month as needed.

21. 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.

Response: Renewal applications that have been pending for one year or more are as follows:

License	Company	Type	Days>365
OK-19614-01	Hayes Evaluation Logging & Perforating	Well Logger	6
OK-26896-01	Anline, Inc.	Well Logger	28
OK-26843-01	Elliot Construction Company	Portable Gauge	29
OK-19775-01	Elite Wireline, Inc.	Well Logger	56
OK-18203-02	Star Pipe Service, Inc.	Portable Gauge	85
OK-14074-02	Weyerhauser Company	Fixed Gauge	86
OK-16722-01	Langston University	Academic	96
OK-27487-01	Equine Medical Associates, Inc.	Veterinary	97
OK-17177-01	McCurtain Memorial Hospital	Medical	99
OK-02084-03	National Oilwell Varco, Inc	Portable Gauge	104
OK-19084-01	TPI Petroleum, Inc.	Fixed Gauge	112
OK-26994-01	McMaster Construction, Inc.	Portable Gauge	118
OK-17054-03	Standard Testing & Engineering	Portable Gauge	119
OK-17723-01	McAlester Regional Health Center	Medical	132
OK-05860-01	Tulsa Regional Medical Center	Medical	177
OK-13821-02	Integris Bass Baptist	Medical	197
OK-23125-01	Memorial Hospital of Texas County	Medical	274
OK-21462-02	Wagoner Community Healthcare	Medical	572
OK-23145-01	Steve R. Harter dba Green Country Wireline	Well Logger	635
OK-16149-01	Stillwater Medical Center	Medical	727
OK-02964-03	Baker Hughes	Well Logger	810
OK-19631-02	Radiation Services and Consultants	Consultant	1289

Renewal applications given a low priority if the application does not indicate any changes to the existing program and if they have been involved in no major enforcement actions.

Renewal applications from licensees that require the reviewers to provide extensive coaching for the applicant to provide needed technical information tend to be set aside as other work takes precedence. The section is working to counteract this tendency by conducting regular licensing meeting during which license reviewers report production since the last meeting, describe current status of ongoing licensing actions and set production goals for the next month.

V. Responses to Incidents and Allegations

22. For Agreement States, please provide a list of any reportable incidents not previously submitted to NRC (See STP Procedure SA-300, Reporting Material Events for additional guidance, OMB clearance number 3150-0178). The list should be in the following format:

Licensee Name	License #	Date of Incident/Report	Type of Incident

Response: The only incident not yet reported to NRC is the fire at Wynnewood refinery which affected some fixed gauges. At this writing, the incident has not passed the 30-day reporting period and the final report has not been received from the licensee.

Wynnewood Refining Company	OK-12636-11	May 12, 2006	Refinery Fire

23. During this review period, did any incidents occur that involved equipment or source failure or approved 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? For Agreement States, 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.

Response: None.

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

Response: No changes

VI. General

25. 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. Provide the results of any program audits (including self audits) completed during the review period.

Response: Recommendation 1: Management has exhorted inspectors to complete inspections on time, and as the program has matured, our efforts on this have improved. An outside contractor has been hired to develop a database which will improve management's ability to readily track inspection status and determine when an inspector is at risk of missing an inspection deadline, and ensure that inspectors are giving high priority to the appropriate inspections. This will be deployed in August 2006, and an Alpha version will be demonstrated for the IMPEP team during the review. It is conceivable that performing the initial inspections for the Increased Controls will create some problems for this, as Oklahoma has a very high number of these due the first year, but this problem should be transient.

Recommendation 2: Management has attempted exhortations to inspectors, and these have had some improvement, but aren't a total solution. The database described above will make it easier to check when there are problems with this, and should improve timeliness of dispatch of findings. Paperwork flow has been streamlined, especially reducing legal review of documents when enhanced enforcement isn't expected, and this has reduced the time reports spend being reviewed by peers and management.

Recommendation 3: The agency has adopted a centralized filing system which reduces casual access to the files, and should result in a filing staff not distracted by other duties.

Recommendation 4: Management wavered in conducting these during 2004, but they were completed for 2005, and all but two for 2006 have already been completed (one not done is by a licensor who does relatively few inspections–A date in June 2006 has been set for his accompaniment). To ensure continuing management attention to this issue, a requirement mandating that accompaniments being performed each year is being added to the Program Manager's "PMP" (evaluation form used to set forth expectations and plan work during each year). Failure to meet this requirement will adversely affect the manager's rating and reduce his eligibility for raises and bonuses, which should help ensure his compliance.

Recommendation 5: We have adopted the recommendation, and terminating amendments have been and are continuing to be issued for all terminated licenses, including those terminated prior to the 2002 IMPEP.

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

Response: Program Strengths include the following:

a) A core of very experienced and capable staff with broad experience. Bishop, Idrissa, Flynn, Sampson, and Matthews are broadly-trained and experienced at licensing and/or inspection. All have been with the Agreement State program since inception in 2000.

b) The Program Manager has a good relationship with upper management, and the Radiation Management Advisory Council. The Agency and Section have an effective relationship with the Governor's office and the Legislature. There has been consistent and effective upper management support for performing necessary training, hiring staff and for recently adding an additional technical FTE, and for effective enforcement including imposition of fines.

c) The Section is largely fee-supported. A small amount of funding comes from EPA Grants, but the program is not subject to the uncertainties of legislative funding. Funding and approval is available to fill vacancies promptly, and to send staff to training. An additional position was recently added to help the staff cope with Increased Control and NARM issues.

d) The Section and the agency have been free from forced reorganizations, mergers, staffing cuts, and other disruptive influences from outside.

e) The Section is modernizing data management practices. Filing has been centralized in an agency professional filing staff. This has been a disruption in the short term, but in the long term should result in more professional filing, and especially in greater control of files. A consultant has been hired to replace the archaic separate databases used by the Section to manage licensing, inspection, and other activities with an integrated modern database. This process is not complete, but is moving satisfactorily, and a "show and tell" of what has been accomplished so far will be given for the IMPEP team during the IMPEP. We actively seek the IMPEP team's input and suggestions on improving the program.

Program weaknesses include the following:

a) The Section is still plagued by turnover among new employees. A contributor to this is undoubtedly the low salary we are allowed to pay Environmental Protection Specialist positions, though since the last IMPEP no staff leaving have left to go to other radiation programs with higher salaries. There has been some improvement in the salary situation, including a one-time salary increase for professional staff, and the ability to pay annual bonuses in some years, but agency salaries are still inadequate.

b) It is likely that the Section will face several important retirements soon. Of the five experienced core staff listed in question 26(a), three are over age 60, and are likely to retire within a few years.

B. NON-COMMON PERFORMANCE INDICATORS

I. Legislation and Program Elements Required for Compatibility

27. Please list all currently effective legislation that affects the radiation control program.

Response: Relevant laws have not changed from the previous IMPEP

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

Response: Our regulations do not have a sunset law.

29. Please review and verify that the information in the enclosed State Regulation Status sheet is correct. For those regulations that have not been adopted by the State, explain why they were not adopted, and discuss actions being taken to adopt them.

If legally binding requirements were used in lieu of regulations, please describe their use.

Response: Note that Oklahoma has adopted the modified financial assurance requirements, RATS ID 2003-1. This isn't reflected on the current SRS sheet as posted on the STP website.

Oklahoma has not yet adopted RATS ID 2004-1 and 2005-1 and -2. We expect to have these adopted by the due dates.

At this time, Oklahoma is enforcing the Increased Controls (IC) requirement through license conditions.

30. 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.

Response: Not applicable

II. Sealed Source and Device Program

Response: Oklahoma does not conduct Sealed Source and Device Evaluations.

31. Prepare a table listing new and amended (including transfers to inactive status) SS&D registrations of sealed sources and devices issued during the review period. The table heading should be:

SS&D Registry Number	Manufacturer, Distributor or Custom User	Product Type or Use	Date Issued	Type of Action

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

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

Technical Staffing and Training - Questions 1-7
Technical Quality of Licensing Actions - Questions 17-21
Responses to Incidents and Allegations - Questions 22-24

III. Low-Level Radioactive Waste Disposal Program

Response: Oklahoma has not developed a low-level radioactive waste disposal program and will not do so until an application for such a site is expected.

34. Please include information on the following questions in Section A, as they apply to the Low-Level Radioactive Waste Disposal Program:

Technical Staffing and Training - Questions 1-7
Status of Materials Inspection Program - Questions 8-11
Technical Quality of Inspections - Questions 13-16
Technical Quality of Licensing Actions - Questions 17-21
Responses to Incidents and Allegations - Questions 22-24

IV. Uranium Recovery Program

Response: Oklahoma does not have a Uranium Recovery Program.

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

Technical Staffing and Training - Questions 1-7
Status of Materials Inspection Program - Questions 8-11
Technical Quality of Inspections - Questions 13-16
Technical Quality of Licensing Actions - Questions 17-21
Responses to Incidents and Allegations - Questions 22-24