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To: Miller, FSME

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ADDRESSEE: Dale Klein

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Conference of Radiation Control Program Directors, Inc.

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March 6, 2007

The Honorable Dale Klein, Chairman
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Chairman Klein:

On behalf of the Conference of Radiation Control Program Directors (CRCPD), thank you for visiting with me and providing an opportunity for me to meet with several of the other Commissioners and staff. Your interest in maintaining a dialogue and collaboration with CRCPD is very important to us and is greatly appreciated.

During our meeting on January 17, 2007, you requested that the CRCPD provide input to you on priority needs for state radiation control programs from NRC should NRC obtain additional budget for assistance to state programs. In response, I have polled our Executive Board and the Executive Board of the Organization of Agreement States (OAS) for their ideas. The following priority items are provided based on input from the leadership of the two organizations:

- 1) Training for state radiation control personnel is the most significant need for state programs. Given the shortages in health physics and other technical personnel and the competition for trained staff in the federal and private sectors, states are forced to hire minimally qualified staff with only a basic science background and then must provide additional training required in the duties of inspection, incident investigation, and licensing. When training is available, it is expensive and requires the staff members to travel outside of their home state. This is especially problematic for developing Agreement States and those in the process of obtaining an Agreement with NRC. States are experiencing similar funding shortfalls as NRC has recently experienced, and now more than ever, we need to work together to develop cost-effective means of providing training for both NRC and state radiation control program staff. Therefore, we would like to explore four options NRC could consider in providing funding for training that would ease the resource burden on the states:
 - a. NRC paying for a percentage of state personnel (travel and per diem) to attend required NRC courses with the individual state program paying for the remainder of the staff
 - b. Sponsorship of existing training courses that can be presented in several locations throughout the country, offering the classes in various states that are willing to host the course and provide classroom space. Under this option, the host state could get a number of slots in the class free of tuition. This concept is similar to the regional training programs that were co-sponsored by the Food and Drug Administration and CRCPD during the 1970s and 1980s.
 - c. NRC sponsorship of training courses to be given in conjunction with the OAS or CRCPD annual meetings. Several professional organizations are providing training currently at the CRCPD Annual Conference.
 - d. NRC and state joint development of web-based programs for training or parts of the required training, such as the basic health physics course, with funding for this effort provided by NRC. This would allow the states to use their limited travel funds for sending staff to training courses that would require more "hands-on" or visual training that would not be amenable to a web-based course.

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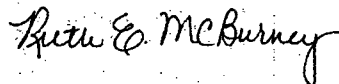
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- 2) Both CRCPD and OAS consider the participation of NRC headquarters and regional office staff at our annual meetings and on working groups to be of high importance. National meetings provide a perfect opportunity for NRC and state radioactive materials staff to interact and share perspectives and information in a professional setting. The development of good working relationships is even more important at a time when both NRC and the state programs are experiencing high rates of turnover through retirements and for other reasons. Increased participation in annual meetings of CRCPD and OAS provides a great means of maintaining strong collaboration of staff on issues of importance to both NRC and the states. If the National Materials Program is to succeed, we will also need the collaboration of staff from both NRC and state programs on working groups to develop regulatory products used by both groups.
- 3) The addition of increased controls, security inspections, nuclear detection, source tracking, and the ability to respond to radiological incidents, including terrorist activities, continues to have an impact on the workload of state regulatory programs. Additional NRC support through grants or contracts through CRCPD would give states the ability to assist NRC in these efforts. An addition to the funds that NRC contributes to the FDA umbrella grant would enable CRCPD to expand the scope of work for these initiatives and would assist states in addressing the additional responsibilities. We also encourage the Commission to continue the effort by Commissioner Lyons for improving communication and cooperation between the states, NRC, and the Domestic Nuclear Detection Office (DNDO) of the Department of Homeland Security (DHS) through a joint working group and the potential for obtaining assistance from DHS to relieve some of the economic burden on state programs in carrying out proposed DNDO programs.

The CRCPD Board and I would be glad to initiate additional dialogue with you or your staff in an effort to reduce the regulatory burden that states are facing with the requirements of additional duties and responsibilities and addressing training for personnel. The success of the state and NRC programs comes from the cooperative efforts and a unified front to assure that radioactive material is being used in a safe, protective, and secure manner. Thank you for championing additional funding to assist the states and for your personal support of state radiation control programs.

Sincerely,



Ruth E. McBurney, CHP
Executive Director

cc: Luis A. Reyes, Executive Director for Operations
Martin J. Virgilio, Deputy Executive Director for Materials, Research,
State and Compliance Programs
Charles Miller, Director, Office of Federal and State Materials and
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