

## Randy Erickson

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**From:** Cynthia Sanders [Cynthia.Sanders@dnr.state.ga.us]  
**Sent:** Thursday, September 04, 2008 3:42 PM  
**To:** Randy Erickson  
**Subject:** Georgia IMPEP Questionnaire 2008-Completed  
**Attachments:** GA IMPEP 2004 Recommendations Current Status as of August 2008.doc

**Importance:** High

\*\* High Priority \*\*

Randy,

I forgot to attach the summary of the status of Georgia's actions taken in response to recommendations from the 2004 IMPEP review. Please include the attached with the 2008 Questionnaire I sent earlier.

Thanks,

Cynthia Sanders

**RESPONSE TO NRC RECOMMENDATIONS  
FOR GEORGIA IMPEP REVIEW AUGUST 2004  
Dated January 5, 2005  
And  
CURRENT STATUS AS OF August 2008**

**Recommendation #1 [Section 3.2]:**

The team recommends that the Program update its inspection procedures to eliminate extensions of license inspection due dates. (Section 3.2)

**Response:**

The Program inspection procedures manual is currently under review and will be updated/revised as appropriate. However Section P1-17 of the inspection manual [Inspection Procedures for the Materials Program] has been revised to eliminate the extensions of inspection due dates. It is anticipated that the draft will be finalized and will be effective as of January 31, 2005.

**STATUS: Section P1-1 of the Inspection Procedures for the Radioactive Materials Program manual has been revised to eliminate the extension of the inspection due dates. Table 1 of the inspection manual lists the license category, license code and inspection priority for each license type. .**

**Recommendation #2 [Section 3.3]:**

The review team recommends that Notice of Violation and licensee acknowledgment letters receives appropriate supervisory review and approval. (Section 3.3)

**Response:**

Program Coordination Branch management is currently evaluating the manpower requirements of the Radioactive Materials Program in conjunction with a restructuring of the Environmental Protection Division (EPD). One option that is being considered is to have entry level supervisors/managers in place to meet the requirement of this recommendation.

The Program currently has a total of 510 licensees which are divided among six Regions.

**Summary of Inspection Statistics for the Past Three Fiscal Years:**

Total number of inspections completed for FY 2002=**180**

Total number of inspections completed for FY 2003=**162**

Total number of inspections completed for FY 2004=**141**

Pending the review and evaluation of manpower needed, the Program Acting Manager will implement the review and approval of Notice of Violations, and licensee Acknowledgement Letters. This was effective on January 1, 2005.

**STATUS: The Inspection Compliance Documents For Management Review and Approval Log was created in January 2005 to ensure management/supervisory review and approval of inspection reports with Notice of Violations. Consent Orders, and licensee Acknowledgement Letters. The Program Manager is currently doing all the review and approvals. An entry-level supervisor has not been put in place yet assist with this recommendation.**

**Recommendation #3 [Section 3.3]:**

The review team recommends that the Program develop and implement a process for conducting annual accompaniments of all radiation compliance inspectors by a supervisor. (Section 3.3)

**Response:**

Program Coordination Branch management is currently evaluating the manpower requirements of the Radioactive Materials Program to meet the needs for this recommendation. One option that is being considered is to have entry level supervisors/managers accompany inspectors to meet the requirement of this recommendation.

**STATUS: The Program Manager has accompanied all inspectors for 2005 and 2006, and focused on new hires for 2007 and 2008. An entry-level supervisor has not been put in place yet to assist with this recommendation.**

**Recommendation #4 [Section 3.3]:**

The review team recommends that the Program revise and implement procedures to address the handling of cases where inspections reveal a systemic breakdown in a licensee's radiation safety program and when a large number of health and safety violations are identified. (Section 3.3)

**Response:**

The Program will establish and implement procedures to address the handling of cases where inspections reveals a systemic breakdown in the licensee Radiation Safety Program, and where there are large number of health and safety violations. The Program will need to identify health and safety violations associated with each type of license, and this will ensure consistency among all inspectors. The projected implementation and completion date is by the end of 2<sup>nd</sup> Quarter 2005.

**STATUS: The Program has established an Enforcement Procedure that addresses the importance of compliance with Department requirements. It describes in detail the Significance of Violations and Severity of Violations. It also addresses the Program's mission to deal with licensees who do not achieve the necessary attention to detail and standard compliance with Department requirements.**

**Recommendation #5 [Section 3.5]:**

The review team recommends that the staff receive training on STP Procedure SA-300, identifying abnormal occurrences, and schedule of reporting of significant events to the NRC headquarters. (Section 3.5)

**Response:**

The Staff will be trained on STP Procedure SA-300, identifying abnormal occurrences, and scheduling of significant events to the NRC Headquarters. The Program has obtained copy of the PowerPoint presentation from the NRC and anticipates training of the staff no later than February 28, 2005. However it has been discussed in a staff meeting and the each Specialist has been provided a copy of the Event Reporting Schedule for Agreement States issued by NRC, Office of State Program, Rev. 1, May 2004.

**STATUS: The state of Georgia has adopted the US Nuclear Regulatory Commission SA-300 Procedures in it entirety on reporting material events to the NRC. The Radioactive Materials Program staff and two staff member from the Environmental Radiation**

**Program were trained on SA 300 Procedures on February 28, 2005. The training is documented. However, new hires after this date have been provide the training slide presentation for review and a copy of NRC Event Reporting Schedule for Agreement States.**

**Recommendation #6 [Section 4.2]:**

The team recommends that the Program develop and qualify one additional Specialist in SS&D evaluations to provide backup for the principal reviewer. (Section 4.2)

**Response:**

The program is currently evaluating its manpower availability to meet the requirements of this recommendation. One option that is being considered is to add another staff member to the Program to share the responsibilities of the SS&D program.

**STATUS: The Program has sent two staff members to attend the NRC Sealed Source & Device (SS&D) Workshop. Kit Ramdeen and Lauren Palmer attended the workshop on April 24-28, 2006. However, Kit and Lauren have fulltime licensing and inspection responsibilities for their assigned regions. Kit has been assigned an SS&D application and Lauren is available for concurrence reviews pending the availability of the manpower to meet this recommendation. Currently Eric Jameson is primary reviewer and the only fully trained SS&D reviewer.**

**Recommendation #7 [Section 4.2]:**

The review team recommends that the Program develop written qualification requirements for the SS&D reviewers. (Section 4.2)

**Response:**

The Program has initiated compiling information to develop written qualifications requirements for Sealed Source & Device Evaluations principal reviewers and concurrent reviewers. The procedure is projected to be completed by the end of 1<sup>st</sup> Quarter 2005.

**STATUS: A written procedure has been established for Qualifications For Reviewers of Sealed Source and Devices Registrations.**

**Recommendation #8 [Section 4.2]:**

The team recommends that the Program establish an objective method to address defects and incidents involving SS&D evaluations that includes the identification of generic issues, trend analysis, and the communication of findings with other regulatory agencies. (Section 4.2)

**Response:**

The Program will establish procedures and implement a method to address licensees with defects and incidents involving Sealed Source & Device Evaluations. The primary SS&D reviewer plans to attend the Root Cause/Incident Investigation Workshop which will be helpful in writing this procedure. The procedure is projected to be completed by the end of 2<sup>nd</sup> Quarter 2005.

**STATUS: The Program has established written Procedures for the Investigation of Sealed & Devices defects and incidents. Also, the Program has established a written license condition for manufacturer / distributor licensees which addresses any defect, deviation, or operation affecting the integrity of the product.**

**Recommendation #9 [Section 4.2]:**

The review team recommends that the staff with primary review and concurrence responsibilities for SS&D evaluations attend a training course on root cause analysis such as the NRC course “Root Cause/Incident Investigation Workshop” (G-205). (Section 4.2)

**Response:**

Eric Jameson is the primary reviewer for Sealed Source & Device Evaluations and he has made application to attend the NRC course G-205, “Root Cause/Incident Investigation Workshop” that is scheduled for Region IV- Arlington, Texas, on December 13 – 17, 2004. The Program received the announcement for the FY 2005 schedule for this course on October 18, 2004. Eric was not accepted in the NRC course for the above date, but he will make application for the next upcoming/scheduled “Root Cause” training course.

**STATUS: Eric Jameson is the primary license reviewer and he has completed the NRC Root Cause Course (G-205). The course was held on October 31<sup>st</sup>–November 4<sup>th</sup>, 2005 in Lisle, IL. His training certificate is on file.**

**Note:**

**Georgia IMPEP Recommendation status assessed by Cynthia Sanders, August 2008**