

## Randy Erickson

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**From:** Cynthia Sanders [Cynthia.Sanders@dnr.state.ga.us]  
**Sent:** Tuesday, September 09, 2008 4:37 PM  
**To:** Randy Erickson  
**Subject:** Updated GA IMPEP 2008 Questionnaire  
**Attachments:** GA IMPEP Questionnaire 2008 - completed.doc

Randy,

Attached is the updated GA IMPEP Questionnaire. Please see the update for Status of Materials Inspection Program for items 11, 12 and 13.

The questionnaire is about 99% complete. You should be able to forward to NRC for distribution to the IMPEP team.

Let me know if you need anything further.

Cynthia Sanders

>>> Randy Erickson <[Randy.Erickson@nrc.gov](mailto:Randy.Erickson@nrc.gov)> 09/08/08 12:05 PM >>>  
Thanks Cynthia

Randy

-----Original Message-----

**From:** Cynthia Sanders [mailto:Cynthia.Sanders@dnr.state.ga.us]  
**Sent:** Monday, September 08, 2008 11:04 AM  
**To:** Randy Erickson  
**Cc:** Kim Lukes  
**Subject:** Re: FW: Addresses for GA IMPEP

Randy,

The address below is correct our office. The address for the exit meeting is 2 Martin Luther King Jr. Drive S.E., Suite 1152 East Tower, Atlanta, Georgia 30334.

Let me know if you need anything further.

Cynthia Sanders

>>> Randy Erickson <[Randy.Erickson@nrc.gov](mailto:Randy.Erickson@nrc.gov)> 09/08/08 8:35 AM >>>  
Cynthia,

Can you confirm your physical address (below) and can you provide me with the physical address where we will be going for the exit on Friday, September 26th at 9:00 am?

Randy

From: Kim Lukes  
Sent: Monday, September 08, 2008 7:24 AM  
To: Randy Erickson  
Subject: Addresses for GA IMPEP

Morning Randy,

Hope you had a good weekend.

Just want to make sure I have the right addresses for the GA IMPEP.

Can you please confirm that the office address is 4220 International Parkway, Suite 100 Atlanta, GA?

Also, what is the address for the DNR HQ, where the exit meeting will be?

Thanks!  
Kim

## INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM

### QUESTIONNAIRE

GEORGIA

Reporting Period: August 27, 2004, to September 26, 2008

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.

#### **A. GENERAL**

1. 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.

#### **B. COMMON PERFORMANCE INDICATORS**

##### **I. Technical Staffing and Training**

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

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

See attached organizational chart for Department of Natural Resources and the Environmental Protection Division reporting structure to the Board of Natural Resources and the Georgia Governor (Sonny Purdue).

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

See Functional Program Coordination Branch (PCB) organization chart.

See Emergency Response and Radiation Programs organizational chart.

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

Same as Emergency Response and Radiation Programs organizational charts.

3. Please provide a staffing plan, or complete a listing using the suggested format below, of the professional (technical) full-time equivalents (FTE) applied to the radioactive materials 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, low-level radioactive waste, uranium recovery, 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:** The following reflect the new title changes for state employees.

Name	Position	Area of Effort	FTE%
Cynthia Sanders	Radioactive Materials Program MG: Environmental Health/Protection	Administrative	100%
Irene Bennett	PS: Environmental Compliance (WL)	Materials Licensing & Compliance; Emergency Response	>95% <5%
Keith St. Cyr	PS: Environmental Compliance (WL)	Materials Licensing & Compliance; Emergency Response	>95% <5%
Eric Jameson	PS: Environmental Compliance (WL)	Materials Licensing & Compliance-SS&D; Emergency Response	>95% <5%
Kit Ramdeen	PS: Environmental Compliance (WL)	Materials Licensing & Compliance; Emergency Response	>95% <5%
Joe Fievet	PS: Environmental Compliance (WL)	Materials Licensing & Compliance; Emergency Response	>95% <5%
Joel Mims	PS: Environmental Compliance (WL)	Materials Licensing & Compliance; Emergency Response	>95% <5%
Travis Cartoski	PS: Environmental Compliance (EL)	Materials Licensing & Compliance; Emergency Response	>95% <5%
Quintena Tinson	PS: Environmental Compliance (EL)	Materials Licensing & Compliance; Emergency	>95%

		Response	<5%
Vacant	PS: Environmental Planning Specialist (AL)	Materials Licensing & Compliance-SS&D; Emergency Response	>95%  <5%
Jim Hardeman	Environmental Radiation Program MG1: Environmental Health/Protection	Administrative	100%
Liz Seale	PS: Environmental Compliance (WL)	Emergency Response & Environmental Monitoring	100%
Elizabeth Drinnon	PS: Environmental Compliance (WL) (Savannah Office)	Emergency Response & Environmental Monitoring	100%
Barty Simonton	PS: Environmental Compliance (WL)	Emergency Response & Environmental Monitoring	100%
Sean Hayes	PS: Environmental Compliance (WL) (Augusta Office)	Emergency Response & Environmental Monitoring	100%
Michele Ruiz	PS: Chem/Mat Specialist (AL)	Laboratory	100%
Cliff Blackman	Natural Resource Worker (temporary / part time)	Emergency Response & Environmental Monitoring	100%
Vacant	PS: Chem/Mat Analys Specialist (SP)	Laboratory	100%

4. 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, as appropriate.

RESPONSE:

Kit Ramdeem was transferred into the Program on June 1, 2005. Mr. Ramdeen has degree in Chemistry, has 4 months as an Environmental Specialist Associate with Georgia Department of Natural Resources, Environmental Protection Division, and has 15 years of analytical chemistry experience in private industry.

Keith St. Cyr was transferred into the Program on May 1, 2006. Mr. St. Cyr has a B.S. degree in Microbiology, has 11.5 years working as an Environmental Specialist with Georgia Department of Natural Resources, Environmental Protection Division, and 2 years working in a radiation chemistry unit laboratory with the state of Louisiana.

Joe Fievet was transferred into the Program on October 16, 2006. Mr. Fievet has a B.S. degree in Chemistry, and has 7.75 years working as an Environmental Specialist with Georgia Department of Natural Resources, Environmental Protection Division.

Sara Smiley was hired with the Program on August 1, 2007. Ms. Smiley has a B.S. degree in Forestry and Natural Resources, and has undergraduate laboratory experience and a summer internship work in an ecology laboratory. [Resigned for new job offer]

Travis Cartoski was hired with the Program on July 16, 2007. Mr. Cartoski has a B.S. degree in Biology, and has 4 years as an Avionic Technician as an enlistment (E-4) in the US Air Force.

Joel Mims was transferred into the Program on November 1, 2007. Mr. Mims has a B.S. degree in Health Physics, 17.5 years as an inspector of radiation producing equipment with Georgia Department of Human Resources, Diagnostic Services X-ray Program.

Krishna Nallan Chakravartula was hired with Program on January 7, 2008, and has a B.S. degree and M.S. degree in Mechanical Engineering. [Resigned for new job offer]

Quintena Tinson was hired with the Program on April 1, 2008. Ms. Tinson has a B.S. degree in Environmental Science, and has undergraduate research laboratory experience working with small quantities of radioactive material.

5. Please list all professional staff who have not yet met the qualification requirements for a license reviewer or materials inspector. For each, list the courses or equivalent

training/experience they need and a tentative schedule for completion of these requirements.

RESPONSE: Quintena Tinson (new hire) has not met the qualification requirements of license reviewer/materials inspection staff (for NRC, Inspection Manual Chapter (IMC) 1246. Georgia has adopted qualifications for license reviewer/materials inspector that are similar to NRC's Manual Chapters 1246. Joel Mims, Joe Fievet, Travis Cartoski, Kit Ramdeen, and Keith St. Cyr are license reviewers/material inspectors, but are still under limited supervision and training by Cynthia Sanders, Program Manager. All new staff have attended three or more of the NRC training courses, except Quintena. Kit and Keith have completed the Five Week Applied Health Physics Course at ORAU in Oak Ridge, TN.

6. Identify any changes to your qualification and training procedure that occurred during the review period.

RESPONSE: New Procedures has been established and implemented for the Sealed Source and Device reviewers qualifications.

7. Please identify the technical staff that left your program during the review period.

RESPONSE: Rod Harrell, Environmental Radiation Specialist , resigned on February 15, 2005 for a better job offer.  
Neil Maryland, Environmental Radiation Specialist, resigned on October 21, 2005 for a better job offer.  
Liz Seale, Environmental Radiation Specialist, transferred to the Environmental Radiation Program on March 1, 2007  
Elizabeth Drinnon, Environmental Radiation Specialist, transferred to the Environmental Radiation Program on March 1, 2007  
Lauren Palmer, Environmental Radiation Specialist, resigned on May 31, 2007 for a better job offer.  
Sara Smiley, Environmental Radiation Specialist, resigned on November 15, 2007 for a better job offer.  
Krishna Nallan Chakravartula, Environmental Engineer, resigned on February 1, 2008 for a better job offer.

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

RESPONSE: The PS: Environmental Planning Specialist (old title Environmental Engineer) is a new position in the Program that was filled and after 3 weeks became vacant again in February 2008. This position is still vacant, and is now affected by the hiring freeze by the state.

9. For Agreement States, does your program have an oversight board or committee which provides direction to the program and is composed of licensees and/or members of the public? If so, please describe the procedures used to avoid any potential conflict of interest.

**RESPONSE:** In the past there was a Medical Advisory Committee, however, this committee has not been active since the last Georgia IMPEP 2004. Their purpose is to advise the Program on the acceptability of physicians who are applying for authorization to use radiopharmaceuticals and to assist the Program on the review and revision of the rules and regulations, and NRC initiatives in the medical/radiopharmaceutical area.

II. Status of Materials Inspection Program

10. Please identify individual licensees or categories of licensees the State is inspecting less frequently than called for in NRC's Inspection Manual Chapter (IMC) 2800 and explain the reason for the difference. The list only needs to include the following information: licensee name, license number, your inspection interval, and rationale for the difference.
11. Please provide the number of routine inspections of Priority 1, 2, and 3 licensees, as defined in IMC 2800; the number of initial inspections; and the number of increased controls inspections that were completed during the review period.

**RESPONSE** During the interval August 15, 2004 through August 31, 2008, the Program conducted a total of 554 inspections, which included 23 reciprocity inspections, 76 initial inspections, and 1 security/safeguards inspection. Of this total (554), 229 were conducted on Priority 1/2/3 licenses: 31 inspections of Priority 1 licenses, 71 of Priority 2, 110 of Priority 3 licenses, and 17 initial inspections of Priority 1/2/3 licenses.

12. Please submit a table, or a computer printout, that identifies inspections of Priority 1, 2, and 3 licensees, increased controls, and initial inspections that were conducted overdue per the applicable guidance. Priority 1, 2, and 3 licensees and initial inspections must be conducted at least as frequently as the inspection intervals established in IMC 2800. Increased controls inspections should be conducted at the intervals established in the Staff Requirements Memorandum for COMSECY-05-0028.

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

- (1) Licensee Name
- (2) License Number
- (3) Priority (IMC 2800)
- (4) Last inspection date or license issuance date, if initial inspection
- (5) Date Due



- (6) Date Performed
- (7) Amount of Time Overdue
- (8) Date inspection findings issued

**RESPONSE** The following table lists any inspections that, according to the IMPEP guidelines in SA-101, were conducted overdue. This includes any initial inspections, as well as any inspections conducted on Priority 1, 2, and 3 licenses.

Facility	Lic No	Lic ext	Prev Insp	Insp Due	Insp Performed	Amt Overdue	Findings Issued	Announce Insp	Insp Priority
<b>Past Due Inspections, Priority 1</b>									
JAN-X	1369	1	9/7/2006	9/30/2007	5/28/2008	238	5/28/2008	FIELD, UNANNOUNCED	priority 1
THE ROBERT T. HART, P.C.	1189	1	11/13/2006	7/30/2007	1/30/2008	180	2/21/2008	ANNOUNCED	priority 1
NOVA DATA TESTING SERVICES	997	1	7/16/2006	7/30/2007	1/18/2008	168	1/24/2008	UNANNOUNCED	priority 1
SOWEGA TESTING SERVICE	923	1	2/14/2007	2/28/2008	8/15/2008	167	8/19/2008	ANNOUNCED	priority 1
GEORGIA POWER	40	4	6/29/2006	6/30/2007	11/6/2007	126	11/13/2007	ANNOUNCED	priority 1
MATEC ENGINEERING AND CONSULTING SERVICES	952	1	2/21/2007	1/30/2008	6/4/2008	124	6/6/2008	ANNOUNCED	priority 1
JAN-X	1369	1	9/7/2006	9/30/2007	1/30/2008	120	2/11/2008	UNANNOUNCED	priority 1
ACUREN INSPECTION	1115	1	11/15/2006	11/30/2007	3/19/2008	109	3/21/2008	UNANNOUNCED	priority 1
SOWEGA TESTING SERVICES	923	1	10/6/2005	10/30/2006	2/14/2007	104	3/2/2007	UNANNOUNCED	priority 1
ROBERT T. HART	1189	1	7/21/2005	7/30/2006	11/13/2006	103	11/13/2006	ANNOUNCED	priority 1
<b>Past Due Inspections, Priority 2</b>									
THERAGENICS CORPORATION	881	5	9/29/2000	9/30/2003	10/17/2005	737	7/19/2006	UNANNOUNCED	priority 2
HURST BOILER & WELDING COMPANY	918	1	3/24/2003	3/30/2005	2/13/2007	673	2/26/2007	UNANNOUNCED	priority 2
SOUTH GEORGIA MEDICAL CENTER	112	1	2/17/2004	2/28/2006	8/9/2007	519	8/13/2007	UNANNOUNCED	priority 2
MEDISCAN, INC	1380	1	4/8/2003	4/30/2005	2/27/2006	297	2/28/2006	UNANNOUNCED	priority 2
RADIOLOGY ASSOCIATES OF MACON	1319	1	7/31/2003	7/30/2005	5/16/2006	286	5/22/2006	UNANNOUNCED	priority 2
ATHENS REGIONAL HOSPITAL	4	1	10/20/2004	10/30/2006	8/15/2007	285	8/21/2007	UNANNOUNCED	priority 2

Facility	Lic No	Lic ext	Prev Insp	Insp Due	Insp Performed	Amt Overdue	Findings Issued	Announce Insp	Insp Priority
JOHN D. ARCHBOLD MEMORIAL HOSPITAL	78	1	10/30/2003	10/30/2005	8/10/2006	280	8/21/2006	ANNOUNCED	priority 2
DIVERSIFIED PHARMACY	891	1	2/10/2003	2/28/2005	10/27/2005	237	10/28/2005	ANNOUNCED	priority 2
NUMED, INC	1259	1	3/31/2003	3/30/2005	11/21/2005	231	11/22/2005	ANNOUNCED	priority 2
<b>Past Due Inspections, Priority 3</b>									
MACON NORTHSIDE HOSPITAL	861	1	2/14/2000	4/30/2004	11/16/2006	916	2/19/2007	ANNOUNCED	priority 3
ATLANTA MEDICAL CENTER	1352	1	1/21/2004	1/30/2006	3/5/2008	755	3/7/2008	UNANNOUNCED	priority 3
THERAGENICS CORPORATION	881	6	9/29/2000	9/30/2003	10/27/2005	747	7/20/2006	UNANNOUNCED	priority 3
LANDIS INTERNATIONAL	941	1	4/8/2003	4/30/2006	1/14/2008	614	1/17/2008	UNANNOUNCED	priority 3
SUMTER REGIONAL HOSPITAL	5	1	10/15/2003	10/30/2006	7/3/2008	603	7/21/2008	ANNOUNCED	priority 3
ANALYTICS, INC.	742	1	12/7/2000	4/30/2004	6/20/2005	410	6/30/2005	UNANNOUNCED	priority 3
MEDCROSS MOBILE SCANNERS	1218	2	5/17/2004	5/30/2006	5/29/2007	359	5/30/2007	UNANNOUNCED	priority 3
CRISP REGIONAL HOSPITAL	74	1	10/17/2002	10/30/2005	10/26/2006	356	11/3/2006	UNANNOUNCED	priority 3
<b>Past Due Inspections, initial inspections</b>									
SMITH NORTHVIEW HOSPITAL	1518	1	7/30/2004	1/30/2005	6/25/2007	1045	6/26/2007	UNANNOUNCED	priority 5
CENTRAL STATE HOSPITAL	1523	1	10/18/2004	4/30/2005	10/18/2006	720	10/18/2006	ANNOUNCED	priority 5
RIS MOBILE	1527	1	1/11/2005	7/30/2005	7/18/2006	547	7/25/2006	ANNOUNCED	priority 3
ST. JOSEPH'S HOSPITAL	296	6	6/15/2004	12/30/2004	12/13/2005	538	12/13/2005	ANNOUNCED	priority 5
LIBERTY REGIONAL MED. CTR	1131	1	9/12/2005	3/30/2006	2/14/2007	512	2/22/2007	ANNOUNCED	priority 5
UROLOGY SURGICAL PARTNERS,	1552	1	11/1/2006	4/30/2007	2/25/2008	474	3/19/2008	UNANNOUNCED	priority 3

Facility	Lic No	Lic ext	Prev Insp	Insp Due	Insp Performed	Amt Overdue	Findings Issued	Announce Insp	Insp Priority
LLC									
DOUGLAS MEDICAL SPECIALISTS	1132	1	11/21/2005	4/30/2006	2/20/2007	449	2/22/2007	ANNOUNCED	priority 5
ADVANCED CARDIAC IMAGING OF MIDDLE GEORGIA	1532	1	4/28/2005	10/30/2005	8/1/2006	453	8/8/2006	UNANNOUNCED	priority 5
RAM K. PURI, M.D., FACCP, FCCP	1533	1	8/3/2005	2/28/2006	10/18/2006	435	10/18/2006	ANNOUNCED	priority 5
CRNG, LLC, DBA WEST GA CARDIOLOGY	1561	1	5/7/2007	11/30/2007	7/11/2008	424	7/14/2008	ANNOUNCED	priority 5
DR. JOHN ATTOKAREN	1560	1	3/20/2007	9/30/2007	5/9/2008	409	5/20/2008	ANNOUNCED	priority 5
CENTRAL GEORGIA HEART INSTITUTE	1528	1	1/18/2005	7/30/2005	3/7/2006	409	3/9/2006	UNANNOUNCED	priority 3
D.BRIAN REMINGTON, M.D., P.C.	1539	1	8/10/2005	2/28/2006	9/18/2006	398	9/18/2006	ANNOUNCED	priority 5

13. Please submit a table or computer printout that identifies any Priority 1, 2, and 3 licensees, increased controls, and initial inspections that are currently overdue, per the applicable guidance. At a minimum, the list should include the same information for each overdue inspection provided for Question 12 plus your action plan for completing the inspection.

**RESPONSE** The following table lists any inspections that are currently overdue, according to the IMPEP guidelines in SA-101. This includes any initial inspections, as well as any inspections scheduled for Priority 1, 2, and 3 licenses.

Facility Name	Lic No	Lic ext	Prev Insp	Insp Due	Amt Overdue (as of 9/9/2008)	Insp Priority
<b>Past Due Inspections, Priority 1</b>					> 90 days	
NONE						
<b>Past Due Inspections, Priority 2</b>					> 180 days	
THERAGENICS CORPORATION	881	5	11/15/2005	11/30/2007	279	2
MALLINCKRODT, INC.	877	1	12/15/2005	12/15/2007	264	2
TRIAD ISOTOPES, INC. D/B/A DIVERSIFIED PHARMACY SERVICES OF MIDDLE GA	891	1	10/27/2005	10/31/2007	309	2
<b>Past Due Inspections, Priority 3</b>					> 270 days	
DALTON IMAGING CENTER	1222	1	11/9/2004	11/15/2007	294.	3
NATIONAL SECURITY ASSOCIATES	1447	1	7/26/2002	7/15/2005	1134	3
EADS SODERN NORTH AMERICA, INC	1382	1	7/1/2004	7/15/2007	414	3
<b>Past Due Inspections, initial inspections</b>			<b>License Issued</b>		> 365 days	
UROLOGY ASSOCIATES SURGERY CENTER, LLC	1563	1	6/26/2007	12/26/2007	433	3

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

III. Technical Quality of Inspections

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

**RESPONSE:** 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.

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

**RESPONSE:**

<u>Inspector</u>	<u>Supervisor</u>	<u>License Category</u>	<u>Date</u>
Elizabeth Drinnon	C. Sanders	Industrial Radiography	07/21/05
Lauren Palmer	C. Sanders	PET Mobile Medical	08/17/05
Eric Jameson	C. Sanders	Medical Mfg.& Dist. (SS&D)	10/17/05
Kit Ramdeen	C. Sanders	Nuclear Pharmacy	10/27/05
Liz Seale	C. Sanders	Medical Institutional	11.03/05
Irene Bennett	C. Sanders	Gamma Knife Medical Inst.	12/13/05
Keith St. Cyr	C. Sanders	Private Practice Medical	10/10/06
Lauren Palmer	C. Sanders	Medical Institutional	11/09/06
Irene Bennett	C. Sanders	Medical Mobile	11/28/06
Eric Jameson	C. Sanders	Medical Mfg.&Dist. (SS&D)	11/30/06
Liz Seale	C. Sanders	Medical Institutional	12/06/06
Kit Ramdeen	C. Sanders	Medical Institutional	12/07/06
Keith St. Cyr	C. Sanders	Private Practice Medical	01/17/07
K. St. Cyr/J. Fievet	C. Sanders	NORM / Fixed Gauge	01/31/07
Keith St. Cyr	C. Sanders	Nuclear Pharmacy	03/08/07
K. St. Cyr/ S. Smiley	C. Sanders	Medical Institutional/HDR	08/15/07
J. Fievet/T. Cartoski	C. Sanders	Medical HDR	08/22/07
Travis Cartoski	C. Sanders	Private Practice Medical	09/18/07
J. Fievet/S. Smiley	C. Sanders	Nuclear Pharmacy	10/24/07
Joel Mims	C. Sanders	Ind Radiography (Incident)	03/12/08
J. Mims/T. Tinson	C. Sanders	Private Practice Medical	06/11/08
Joel Mims	C. Sanders	Medical Institutional/HDR	07/29/08

17. 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 throughout the review period?

**RESPONSE:**

The Georgia RMP currently possesses and uses the following survey instruments:

Bicron Model Surveyor 2000E w/ECPGM probe (6 total)  
Ludlum Model 2241-3 w/ probes (2 total)  
Eberline Model RO-20 (1 total)  
Eberline Model RO-2A (2 total)  
Eberline Model PRM-7 (1 total)  
Exploranium GR-135 (1 total)

All instruments are either within calibration, or are currently in the process of being calibrated, including waiting for issuance of Departmental Purchase Order. For FY2009, starting 07/01/2008, responsibility for maintaining survey instrumentation was assigned to Travis Cartoski and Quintena Tinson. The responsibility is rotated annually among specialists.

Additionally, the Program possesses the following instruments, but only calibrates them on an "as needed" basis:

Eberline Model ESP-2 w/probes, including alpha (7 total)  
Victoreen Model 410 (1 total)  
Ludlum Model 2241-2 w/probes (1 total)  
Ludlum Model 12 (1 total)  
Ludlum Model 19 (1 total)  
Eberline PNC-4 w/neutron detector (1 total)

Currently, the Program sends the instruments to the manufacturer for repair (as needed) and calibration (intervals not to exceed 12 months). Additionally, the Program sends some instruments to Ludlum Measurements (Sweetwater, TX). The Program utilizes the Environmental Radiation Program's mobile laboratory, resources and staff whenever needed, for instance, analysis of wipe samples.

**IV. Technical Quality of Licensing Actions**

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

**RESPONSE:** Roughly 521 as of August 2008.

19. 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.

**RESPONSE:** Georgia Institute of Technology [License # GA 147-1], an academic broad licensee, submitted a Letter of Intent dated April 4, 2004 to decommission the Cobalt 60 Pool Irradiator, hot cell, and Neeley Nuclear Research Center. After 250 Cobalt 60 sources were removed, the licensee submitted a letter dated November 20, 2006 requesting to put intent to decommission on hold. This is pending further follow up by the licensee.

Imery's [License # GA 903-1] submitted decommissioning information dated June 2006, later held a meeting with the Radioactive Materials Program, and resubmitted an application dated February 2008 for decommissioning of their NORM facility in Jefferson, Georgia. This application review is currently ongoing by the Program.

20. Identify any licensees or groups of licensees that were issued increased controls during the review period. Those licensees that were initially identified during the initial implementation of increased controls need not be listed.

**RESPONSE:** No new licensees were issued for increased controls during the review period in addition to those initially identified during implementation.

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

**RESPONSE:** No exemptions or variances were granted during the review period.

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

**RESPONSE:** The following Radioactive Materials Licensing Guides were revised during the review period:

Guide for Portable Gauges [November 2005, Rev. 5].

Guide for Installed Gauges and Gas Chromatographs [March 2007, Rev. 4]

Guide for Industrial Radiography [April 2007, Rev. 2]

Guide for Calibrating Radiation Survey and Monitoring Instruments [May 2007, Rev. 4]

Guide for Veterinary [June 2007, Rev. 3]

23. Identify by licensee name and license number any renewal applications that have been pending for one year or more. Please indicate why these reviews have been delayed and describe your action plan to reduce the backlog.



RESPONSE: Theragenic Corporation [License # GA 881-5] renewal application received 05/09/07. Review were pending outcome of performance study on possible operational issue with cyclotron vault rotating. Program intends to issue this license by September 10, 2008.

Imery's [GA 903-1] initial decommissioning submission dated June 2006 for NORM facility (kaolin plant). Resubmitted a second decommissioning application dated February 2008 that superceded the initial submission.

Imery's [GA 43-1] amendment request to change RSO, and is pending additional information for training and experience. The licensee has since submitte a renewal application. This is a NORM facility (kaolin plant].

V. Technical Quality of Incident and Allegation Activities

24. For Agreement States, please provide a list of any reportable incidents not previously submitted to NRC (See Procedure SA-300, *Reporting Material Events*, for additional guidance, OMB clearance number 3150-0178). 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>
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RESPONSE: All reportable incidents/events have been submitted to NMED as of August 2008.

25. 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: The Department has not been notified and/or is not aware of any incidents involving devices or sources failures authorized for manufacture and/or distribution by Georgia licensees.

26. Identify any changes to your procedures for responding to incidents and allegations that occurred during the period of this review.

RESPONSE: A new procedure for Allegations was established and implemented in October 2004.

**C. NON-COMMON PERFORMANCE INDICATORS**

**I. Compatibility Requirements**

27. Please list all currently effective legislation that affects the radiation control program. Denote any legislation that was enacted or amended during the review period.

**RESPONSE:** No legislation was enacted or amended for the review period. O.C.G.A. 31-13 was last amended in 1990. However, the 274i Agreement was signed and approved by the Dr. Carol Couch, EPD Director, on April 22, 2004.

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

**RESPONSE:** No. The Department Rules and Regulations for Radioactive Materials are not subject to "Sunset" laws.

29. Please review and verify that the information in the enclosed State Regulation Status (SRS) 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:** See below a list of revisions to the proposed Georgia Chapter 391-3-17, Rules and Regulations for Radioactive Materials, with a revision date of July 1, 2008. The Environmental Protection Division (EPD) briefed the Georgia Department of Natural Resources (DNR) Board members on the proposed rules on March 25, 2008. The proposed revisions were first made available for public comments through a memorandum dated March 26, 2008 and via EPD's website, with a request date for comments by May 23, 2008. A public meeting was held on April 21, 2008, and a public hearing was held on May 5, 2008 on the proposed rule amendments. After the public comment period, the Division made a few corrections, and briefed the DNR Board members again on June 24, 2008. EPD re-noticed the proposed rules in July 2008 with the corrected errors, and anticipates taking the proposed rules to the DNR Board in September 2008 for final adoption. The Georgia State Regulation Package for Review was submitted to NRC on August 12, 2008. .

<u>Rats ID</u>	<u>Title</u>	<u>State Section</u>
2002-1	Revision to Skin Dose Limits - Part 20	Chapter 391-3-17-.01, Definitions. Amended Chapter 391-3-17-.03, Standards for Protection Against Radiation. Amended

2003-1	Financial Assurance for Materials Licensees – Parts 30, 40, 70	Chapter 391-3-17-.02, Licensing of Radioactive Materials. Amended
2004-1	Compatibility with IAEA Transportation Safety Standards and Other Transportation Safety Amendments - Part 71	Chapter 391-3-17-.06, Transportation of Radioactive Materials. Amended
2005-1	Security Requirements for Portable Gauges Containing Byproduct Material - Part 30	Chapter 391-3-17-.02, Licensing of Radioactive Materials. Amended
2005-2	Medical Use of Byproduct Material - Recognition of Specialty Boards, Part 35	Chapter 391-3-17-.05, Use of Radionuclides in the Healing Arts. Amended
2006-1	Minor Amendments – Parts 20, 30, 32, 35, 40, 70	Chapters 391-3-17-.02., .03 and .05. Amended
2006-2	National Source Tracking System - Serialization Requirements –Parts 32 (with reference to Part 20 Appendix E)	Chapter 391-3-17-.03 Standards for Protection Against Radiation. Amended (Previously Issued a License Condition)
2006-3	National Source Tracking System – Part 20	Chapter 391-3-17-.03, Standards for Protection Against Radiation. Amended
2007-1	Medical Use of Byproduct Material -	Chapter 391-3-17-.05, Use of Radionuclides in the Healing Arts. Amended

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:** Any RATs ID that went beyond the NRC 3 year implementation timeline has been included with 2008 Georgia radioactive materials rule revisions, which are pending final approval by the Georgia DNR Board.

II. Sealed Source and Device (SS&D) Evaluation Program

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

SS&D Registry <u>Number</u>	Manufacturer, Distributor or <u>Custom User</u>	Product Type or <u>Use</u>	Date <u>Issued</u>	Type of <u>Action</u>
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RESPONSE: During this IMPEP review period, the Program issued a total of 27 SS&D review actions, with an additional review performed to determine if a SS&D review need to be performed.

SS&S Registry Number	Manufacturer, Distributor, or Custom User	Product Type or Use	Date Issued	Type of Action
GA-716-D-110-S	Scan Technologies	Industrial gauge	2/4/2008	New
GA-716-D-106-G	Scan Technologies	Industrial gauge	2/4/2008	Amendment – add comparable source
GA-1077-D-101-S	EADS Sodern	Industrial gauge	4/4/2007	amendment
GA-269-D-102-S	Elekta, Inc.	Stereotactic device	3/26/2007	amendment – update source info
GA-269-S-103-S	Elekta, Inc.	Medical source	3/26/2007	amendment
GA-716-D-103-S	Scan Technologies	Industrial gauge	3/23/2007	amendment – update source info
GA-716-D-104-S	Scan Technologies	Industrial gauge	3/23/2007	amendment – update source info
GA-716-D-107-S	Scan Technologies	Industrial gauge	3/23/2007	amendment – update source info
GA-716-D-109-S	Scan Technologies	Industrial gauge	3/23/2007	amendment – update source info
GA-269-D-104-S	Elekta, Inc.	Stereotactic device	3/2/2007	New
GA-1148-D-101-S	Proxima Therapeutics	LDR Brachytherapy device	5/23/2006	Name change (to Cytac Surgical Products)

SS&S Registry Number	Manufacturer, Distributor, or Custom User	Product Type or Use	Date Issued	Type of Action
GA-716-D-109-S	Scan Technologies	Industrial gauge	05/16/2006	New/transfer to GA
GA-1077-D-101-S	Krupp Polysius	Industrial gauge	05/15/2006	Name change (to EADS Sodern)
GA-716-D-104-S	Scan Technologies	Industrial gauge	04/07/2006	amendment
GA-1115-D-101-S	Novoste Corporation	IVB device	03/07/2006	Name change (to Best Vascular)
GA-1147-D-102-S	MGP Instruments	Irradiator, cat I	9/23/2005	amendment
GA-645-S-102-S	Theragenics	Brachytherapy source	9/22/2005	Amendment
GA-645-S-101-S	Theragenics	Brachytherapy source	08/17/2005	Amendment
GA-1138-D-105-S	Hopewell Designs	Irradiator, cat I	07/29/2005	New
GA-1115-D-101-S	Novoste Corporation	IVB device	05/24/2005	Amendment
GA-596-D-113-G	Metso Automation	Industrial gauge	4/28/2005	Amendment
GA-1061-S-102-S	IBt	Brachytherapy source	02/18/2005	New
GA-1138-D-104-S	Hopewell Designs	Irradiator, cat I	02/17/2005	New
GA-1138-D-101-S	Hopewell Designs	Irradiator, cat I	01/13/2005	amendment
None assigned	Theragenics	Irradiator, cat I	N/A – can possess under broad scope license	Applicability review
GA-645-D-103-S	Theragenics	Ocular Brachytherapy device	08/09/2004	New

SS&S Registry Number	Manufacturer, Distributor, or Custom User	Product Type or Use	Date Issued	Type of Action
GA-596-D-113-G	Metso Automation	Industrial gauge	07/28/2004	amendment
GA-1138-D-103-S	Hopewell Designs	Irradiator, cat I	07/26/2004	New

32. Please include information on the following questions in Section A, as they apply to the SS&D Program:

Technical Staffing and Training - Questions 2-9

RESPONSE: At the start of this IMPEP review period, staff involved in SS&D reviews were as follows:

Eric Jameson	Primary Reviewer (performs initial reviews)
Elizabeth Drinnon	Concurrence Reviewer
Rod Harrell	Concurrence Reviewer
Cynthia Sanders	Concurrence Reviewer

During the IMPEP review period, the following staff began participation in SS&D review activities:

Lauren Palmer	Concurrence Review
Kit Ramdeen	Concurrence Review, training for initial review

During the IMPEP review period, the following SS&D review staff left the Program:

Elizabeth Drinnon  
Lauren Palmer

The Program has a vacant Environmental Engineer I position. The individual who fills this position will be trained in SS&D review. Currently, because of statewide budget constraints, this position is frozen.

In response to a recommendation from the previous IMPEP, the Program implemented a written SS&D qualification and training procedure.

Technical Quality of Licensing Actions - Questions 18-23

RESPONSE: 18. As of 8/31/2008, Georgia currently has 34 active SS&D certificates among 12 vendors (i.e., manufacturer/distributor licensees). Additionally, there are 34 certificates either listed as "inactive" or are awaiting inactivation (either requested by the licensee, or the licensee has terminated its distribution license).

- |     |                          |                   |                           |
|-----|--------------------------|-------------------|---------------------------|
| 19. | GA-269-D-104-S<br>Device | Elekta, Inc.      | Perfexion Stereotactic    |
|     | GA-1138-D-103-S          | Hopewell Designs  | DI40 series irradiator    |
|     | GA-1138-D-104-S          | Hopewell Designs  | UD794 irradiator          |
|     | GA-645-D-103-S<br>Device | Theragenics, Inc. | TheraSight Ocular Brachy. |
20. Refer to Common Performance Indicator section; not issued separately
21. None issued
22. None issued
23. SS&D certificates do not have expiration dates, thus do not have renewals.

Technical Quality of Incident and Allegation Activities - Questions 24-26

- RESPONSE: 24. Refer to Common Performance Indicator section
25. In response to a recommendation from the previous IMPEP, staff looked at reported failures of the Novoste (now Best Vascular) BetaCath device. Most failures involved a similar mode of failure. However, most of these involved an older model of the device, with the "loose" source train; this model has been superceded by the "jacket" source train and is no longer in use.
- No incidents involving devices with Georgia-issued SS&D certificates were reported.
23. Refer to Common Performance Indicator section.

III. Low-Level Radioactive Waste Disposal Program

RESPONSE: Not Applicable.

33. 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 2-9  
 Status of Materials Inspection Program - Questions 10-14  
 Technical Quality of Inspections - Questions 15-17  
 Technical Quality of Licensing Actions - Questions 18-23  
 Technical Quality of Incident and Allegation Activities - Questions 24-26

IV. Uranium Recovery Program

**RESPONSE: Not Applicable.**

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

Technical Staffing and Training - Questions 2-9

Status of Materials Inspection Program - Questions 10-14

Technical Quality of Inspections - Questions 15-17

Technical Quality of Licensing Actions - Questions 18-23

Technical Quality of Incident and Allegation Activities - Questions 24-26