

# Georgia Department of Natural Resources

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Noel Holcomb, Commissioner

Environmental Protection Division

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December 4, 2008

Mr. Aaron T. McCraw, IMPEP Project Manager  
Office of Federal and State Materials and Environmental Management Programs  
US Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Mr. McCraw:

This is in reference to your memorandum dated November 21, 2008, transmitting Georgia's Integrated Materials Performance Evaluation Program (IMPEP) Proposed Final Report. We have reviewed the report and would like to provide our responses to the proposed recommendations. We sincerely appreciate the time, effort and expertise provided by the IMPEP Review Team in assessing our regulatory program. The insights and informal recommendations will be valuable as we continue to improve our Agreement State program.

The responses to the proposed recommendation are enclosed on the following page. Thank you for giving us an opportunity to respond on the IMPEP Report. Should you require further information, please contact Jim Sommerville, Program Coordination Branch Chief, at (404) 656-3310 or Cynthia Sanders, Manager, Radioactive Materials Program at (404) 362-2675.

Sincerely,



Carol A. Couch  
Director

The Georgia Environmental Protection Division's Radioactive Materials Program's responses follow the proposed IMPEP recommendations:

1. The review team recommends that the State develop, document, and implement a formal qualification program for licensing and inspection activities that includes written documentation and supervisor endorsement of competency in each program area (Section 3.1).
  - a. The Division's Radioactive Materials Program will develop and implement a formal qualification program for licensing and inspection activities. We will rely on NRC and other Agreement States to provide a template for documenting a qualification program. This recommendation is expected to be completed by December 2010.
2. The review team recommends that the State update their inspection procedures and enforcement guidance to include the requirements for timely follow-up of Increased Controls violations (Section 3.3)
  - a. The Division's Radioactive Materials Program will update their inspection procedures and enforcement guidance to include requirements for timely follow-up of Increased Controls violations. This recommendation is expected to be completed by December 2009.
3. The review team recommends that the State develop and implement a process for conducting annual accompaniments of all radiation compliance inspectors by a supervisor (Section 3.3 of the 2004 IMPEP report).
  - a. The Division's Radioactive Materials Program will maximize their efforts to ensure that a manager accompanies each inspector on at least one inspector per year starting in 2009.
4. The review team recommends that the State qualify one additional reviewer in SS&D evaluations to provide backup for the principal reviewer (Section 4.2 of the 2004 IMPEP report).
  - a. When budget conditions allow, the Division's Radioactive Materials Program will hire one additional staff member and train one additional staff member to conduct Sealed Source and Device evaluations.

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