

## Performance Improvement Plan and Progress Report

April 16, 2009

Arizona Radiation Regulatory Agency

Recommendations	Task	Milestones	Assigned to	Anticipated Completion Date	Status	Actual Completion Date
1. State develop and use qualification journals to track and monitor training for technical staff.	A. Ensure training courses for technical/professional development.	1. Develop and implement qualification program with individual qualification records.	RAM Program Manager	7/1/2008	Completed, in place,	5/1/2008
	B. Cross training by all health physics staff.	1. Develop and implement cross training program.	Program Managers.	07/01/2009	Initial discussions.	
2. State ensure that license reviewers be provided appropriate training to ensure familiarity with medical license modalities.	A. Ensure training for license reviewers of medical licenses.	1. Develop a short term license reviewer training program.	RAM Program Manager	7/21/2008	Completed when J. Mullauer completed the mentoring session.	7/21/2008
3. State take appropriate measures to conduct core inspections (including initial inspections) in accordance with the inspection priority schedule in IMC 2800, and conduct reciprocity inspections in accordance with IMC 2800.	A. Improve quality of database.	1. Review 100% of license data entry in database to ensure accurate information is in database.	RAM Program Manager	11/15/2008	Initial review complete as of 7/1/2008, second review now complete, 12/31/2008	12/31/2008
	B. Reduce the number of overdue inspections.	1. Review and distribute a monthly listing of the licenses due and overdue for inspection.	RAM Program Manager	Next listing due 05/15/2009	April 15, 2009 listing in use.	Current as of 04/15/2009
		2. Review the licenses inspected by each inspector to assure appropriate	RAM Program Manager and Agency Director	Currently performing the 4/2009 and 5/2009	As of 04/01/2009, the number of overdue for inspection has been reduced to 0.	On going, latest data 4/15/2008

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		licenses are being inspected.		inspections.		
	C. Inspect core reciprocity licenses in a timely manner.	1. List and highlight on monthly licensees due for inspection, out-of-state licensees who are due for inspection.	RAM Program Manager	Currently conducting inspection from the 4/2009 listing.	Currently up to date on inspections including reciprocity.	On going
4. State conduct follow up inspections of licensees with unresolved violations or issues with regard to the Increased Controls requirements to ensure that appropriate corrective actions were implemented.	A. Follow up on each identified unresolved violation or issue.	1. Close out each file as the responses are received, monthly reports.	Goretzki	All inspections performed prior to February 2009 have been closed or awaiting supplemental responses.	March review completed 04/15/2009	On going.
		2. Initiate correspondence when response is overdue by 15 days and consider re-inspecting if response is overdue by 60 days.	Goretzki		March review completed	04/15/2009
5. The State review its Increased Controls files to ensure that all sensitive security-related documents are labeled accordingly.	A. Review each file as it is processed for sensitive information and documents.	1. Checklist prepared and used to determine sensitive information..	Kern	Continuous, three independent reviews are made as each licensing action	Latest revised check lists are dated 8/22/2008	8/22/2008

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		2. Review inspection reports and responses for sensitive information.	Goretzki	Continuous, three independent reviews are made to assure all material is properly marked and filed.	Currently a review is made for each inspection report by at least 2 individuals plus the inspector.	5/31/2008 On going.
6. The State should have a manager accompany each inspector, at least annually, to ensure quality and consistency in the inspection program.	A. Management accompanies each inspector on at least one inspection per quarter.	1. 1. Report of each accompaniment placed in respective inspector training file.	RAM Program Manager and Godwin	Initially 10/3/2008. For 2009 12/1/2009	NRC required accompaniments complete for 2008. 2009 being scheduled.	
7. The State ensures its licenses are properly categorized and assigned the correct inspection frequency.	A. Review each file as it is processed for proper classification and inspection frequency.	1. Inspectors are instructed to check the classification listed when they conduct the inspection.	RAM Program Manager	11/15/2008	Now a part of the inspection routine.	Reviewed with inspectors each 6 months.
8. The State ensure proper documentation of training and experience for authorized users, authorized medical	A. Have applicants get complete preceptor attestations if not available in other files.	1. Confirm all files checked by IMPEP team have proper supporting documentation.	Kern	3/30/2008	Completed, March 2008.	3/30/2008

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physicist, authorized nuclear pharmacists and radiation safety officers.	B. Review all other medical files who added medical users since 2006.	1. Confirm all files have proper supporting documentation.	Kern	4/31/2008	Completed, April 2008	4/30/2008
	C. Develop a licensing checklist for each license type.	1. Develop lists until all are completed.	Kern	Monthly check on progress, 11/15/2009	Use the check lists in appropriate NUREG-1556. Developing licensing review comments. Three checklists complete.	
9. The State implement a detailed and documented license review system to ensure accuracy and consistency for all licensing actions.	A. See 8.C. above.	1. See 8.C.1. above. In addition, review by at least 2 other staffer to confirm all actions appropriate and consistent.	Kern	Multiple reviews implemented 5/31/2008, the check list development is still in progress.	Multiple reviews implemented 5/31/2008, the check list development is still in progress with monthly reviews	Multiple reviews, 05/31/2008
	B. Written procedure to be developed when a majority of checklists are complete	1. Written procedure started by 12/31/2009.	Kern	Written procedure completed by 04/30/2010.	Awaiting more checklists to be completed.	
10. The State implement the pre-licensing checklist and guidance for all licensing actions to provide assurance that radioactive material will be used as	A. Develop and update as necessary a pre-licensing checklist compatible with the NRC guidance for assuring the radioactive material will be utilized	1. The pre-licensing checklist was developed and implemented by 4/1/2008.	Kern	4/1/2008 Updated 8/22/2008	In use. Up date being prepared to reflect September 2008 changes to NRC checklist.	4/1/2008

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specified on the license.	in accordance with license.					