

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
612 EAST LAMAR BLVD, SUITE 400
ARLINGTON, TEXAS 76011-4125

August 18, 2009

ARIZONA HEIGHTENED OVERSIGHT CONFERENCE CALL SUMMARY

NRC RIV	NRC FSME	ARRA
Art Howell, Director	Duncan White, Branch Chief	Aubrey Godwin, Director
Charles Cain, Deputy Director	Aaron McCraw	Robert Cope, Manager
Linda McLean, RSAO	Janine Katanic	
	William Rautzen	

Summary

On July 30, 2009, NRC conducted the first Heightened Oversight conference call with the Arizona Radiation Regulatory Agency (the Agency) to discuss their progress under the Performance Improvement Plan (the Plan) (enclosed).

During the call it was noted that the Agency continued to make progress in their efforts to reduce the inspection and licensing backlogs. The Agency continues to keep up with all current Priority 1, 2, and 3 licenses that become due.

Discussion

The Plan, dated July 16, 2009, addressed each recommendation from the 2008 IMPEP review. The Agency divided each recommendation into tasks, milestones, and staff assignments that they believed were necessary to successfully address each recommendation.

Recommendations

1. The review team recommends that the State develop and use qualification journals to track and monitor training for technical staff.

Status – Journals are now being used to track and monitor staff training. The Agency was reminded of the FSME letter (09-043) requesting Agreement States to supply their training needs to NRC for FY 2010.

2. The review team recommends that the State ensure that license reviewers be provided appropriate medical training to ensure familiarity with medical license modalities.

Status – This recommendation is completed.

3. The review team recommends that the 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 1220.

Arizona Heightened Oversight
Conference Call Summary

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bcc via E-mail:

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Chuck Cain, DD:DNMS

Robert Lewis, FSME

Terry Reis, FSME

Duncan White, FSME

Randy Erickson, RSAO:DNMS

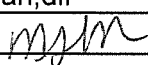
Linda McLean, RSAO:DNMS

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ADAMS	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> SUNSI Rev Complete	Reviewer Initials:	mlm
Publicly Available	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Nonsensitive		
RIV: DNMS/RSAO				
MLMcLean;dlf				
				
8/18/09				

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Status – The Agency has completed core inspections as required through July and has in place an inspection planner through September 15, 2009. The Agency has reduced the backlog of all inspection priorities through June 16, 2009, and, with some difficulty, has kept up with reciprocity inspections. The Agency also plans to send two x-ray inspectors to materials courses in 2010 for cross-training. This action will assist the Agency in conducting core inspections in accordance with the inspection priority schedule in NRC Manual Chapter 2800.

4. The review team recommends that the 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.

Status – All inspections performed prior to May 2009 have been closed or are waiting supplemental responses. The last review of inspections was completed on June 15, 2009.

5. The review team recommends that the State review its Increased Controls files to ensure that all sensitive security-related documents are labeled accordingly.

Status – The Agency is labeling all sensitive-related documents appropriately.

6. The review team recommends that an Agency manager accompany each inspector, at least annually, to ensure quality and consistency in the inspection Agency.

Status – No inspector accompaniments have been conducted so far for 2009. However, the manager has committed to completing them before the end of the year.

7. The review team recommends that the State ensure its licenses are properly categorized and assigned the correct inspection frequency.

Status – This recommendation is ongoing and is being done routinely.

8. The review team recommends that the State ensure proper documentation of training and experience for medical authorized users, authorized medical physicists, authorized nuclear pharmacists, and radiation safety officers.

Status – This recommendation is completed.

9. The review team recommends that the State implement a detailed and documented license review system to ensure accuracy and consistency for all licensing actions.

Status – Part A of the Plan has been completed. Part B of the Plan (establishing procedures and checklists) is in progress. The next updated Plan will detail the procedures and checklists that still need to be completed.

10. The review team recommends that the State implement the prelicensing checklist and guidance for all licensing actions to ensure radioactive material will be used as specified on the license.

Status – The Agency is using NRC's checklist for prelicensing guidance.



Linda McLean
Regional State Agreements Officer

Enclosure
7-09 Arizona PIP

cc:
Aubrey Godwin, Director
Arizona Radiation Regulatory Agency
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Performance Improvement Plan and Progress Report

July 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	Two staff scheduled for basic training. Additional training to be scheduled	Initial courses 6/16/2009, now on going.
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. 2. Review the licenses inspected by each inspector to assure appropriate licenses are being	RAM Program Manager	Next listing due 07/15/2009	Sept 15, 2009 listing in use.	Current as of 06/15/2009
			RAM Program Manager and Agency Director	Currently performing the 5/2009 and 6/2009 inspections.	As of 04/01/2009, the number of overdue for inspection has been reduced to 0.	On going, latest data 6/15/2008

Performance Improvement Plan and Progress Report

July 16, 2009

Arizona Radiation Regulatory Agency

Recommendations	Task	Milestones	Assigned to	Anticipated Completion Date	Status	Actual Completion Date
		inspected.				
	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 Sept. 2009 listing.	Currently up to date on inspections including reciprocity.	Ongoing
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. 2. Initiate correspondence when response is overdue by 15 days and consider re-inspecting if response is overdue by 60 days.	Goretzki Goretzki	All inspections performed prior to May 2009 have been closed or awaiting supplemental responses.	June review completed 06/15/2009 May review completed	Ongoing 06/15/2009
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, 3 independent reviews are made as each licensing action is completed	Latest revised check lists are dated 8/22/2008	8/22/2008

Performance Improvement Plan and Progress Report

July 16, 2009

Arizona Radiation Regulatory Agency

Recommendations	Task	Milestones	Assigned to	Anticipated Completion Date	Status	Actual Completion Date
		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 Ongoing
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 physicist, authorized nuclear pharmacists and radiation safety officers.	A. Have applicants get complete preceptor attestations if not available in other files. B. Review all other medical files who added medical users since 2006.	1. Confirm all files checked by IMPEP team have proper supporting documentation. 1. Confirm all files have proper supporting documentation.	Kern	3/30/2008	Completed, March 2008.	3/30/2008
			Kern	4/31/2008	Completed, April 2008	4/30/2008

Performance Improvement Plan and Progress Report

July 16, 2009

Arizona Radiation Regulatory Agency

Recommendations	Task	Milestones	Assigned to	Anticipated Completion Date	Status	Actual Completion Date
	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 two other staffers 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 prelicensing checklist and guidance for all licensing actions to provide assurance that radioactive material will be used as specified on the license.	A. Develop and update as necessary a prelicensing checklist compatible with the NRC guidance for assuring the radioactive material will be utilized in accordance with license.	1. The prelicensing checklist was developed and implemented by 4/1/2008.	Kern	4/1/2008 Updated 8/22/2008	In use. Update being prepared to reflect September 2008 changes to NRC checklist.	4/1/2008