

National Source Tracking System Data Integrity Team Charter

Background

On August 8, 2005, the Energy Policy Act of 2005, directed the NRC to issue regulations establishing a mandatory source tracking system for radiation sources in the United States. The Act required this tracking system to: 1) enable the identification of each radiation source by serial number or other unique identifier; 2) require reporting within seven days for any change in source possession; 3) require reporting within twenty-four hours of any loss of control or accountability for a source; and 4) provide for reporting through a secure internet connection. Under the Act, radiation sources is defined as a Category 1 or 2 source as defined in the IAEA Code of Conduct on the Safety and Security of Radioactive Sources, which has been incorporated into 10 CFR 20, Appendix E.

In response to the Energy Policy Act of 2005, the NRC published a final rule in 10 CFR 20.2207, establishing the National Source Tracking of Sealed Sources on November 8, 2006. This rule required NRC licensees, Agreement State licensees, and DOE complexes, to report their inventory of Category 1 and 2 radiation sources to the NRC by November 15, 2007 for Category 1 sources, and November 30, 2007 for Category 2 sources. 10 CFR 20.2207 stipulates that in addition to reporting the identification and location of Category 1 and 2 radiation sources, that any change in possession or permanent location requires reporting by the close of the next business day. Current regulations already require immediate reporting of any loss of control or accountability of a source and no additional rule change was needed to implement this area of the Act. The Rule also established a secure on-line internet system for reporting, but also provided for mailing, paper faxing, batch file electronic reporting, or telephone notification with paper document follow-up in order to comply with the radiation source tracking reporting requirements. The new Rule requires an annual reconciliation of their radiation source inventory be completed by January 31 of each year, with the first reconciliation due in January 2008 to verify the accuracy of their data in NSTS. In addition, the rule requires licensees to correct any errors that are identified within five business days of the discovery.

Current Situation

Based on the annual record reconciliation activity of licensees in January 2009, approximately 800 licensees (out of 1,300) reported errors in the National Source Tracking System associated with 20,000 – 34,000 radiation sources (out of 65,000 in NSTS). A review by FSME staff revealed various types of inaccurate records. The most frequently identified error involves accurate source manufacturer and model number designations based on the records contained in the Sealed Source and Device Registry. Other types of errors include: incorrect address, device listed without source information. In addition, due to the existing record errors there is a growing backlog of newly manufactured source entries. One significant contributor to the errors concerns gaining secure access to the NSTS for each licensee.

Many of the reported errors were caused by licensees who do not yet have on-line access to the NSTS and have instead, provided paper records of their source inventory. Without referring to their existing records in the NSTS, these licensees generated

additional records to meet the annual reporting requirement, without the ability to correct and replace the existing records. The resulting differences remain to be rectified and represent a majority of the record inconsistencies. Currently, there are 715 license holders (representing a smaller number of licensees) that have on-line access. Increasing the population of licensees that have on-line NSTS access will position them to correct their own records and will relieve the NRC from accepting this burden in maintaining an accurate database going forward.

Objectives

The purpose of the NSTS data integrity team effort is to identify the existing errors in the NSTS database, interface with the applicable licensees to determine needed corrections, correcting the existing errors, and establishing an accurate National Source Tracking System by the end of 2009. In addition, during licensee contacts, make efforts to recruit additional on-line users. A parallel outreach effort is being made by the Source Management and Protection Branch to enlist additional on-line users for those licensees that are not contacted by the NSTS Data Integrity Team. On-line licensee access will ensure that future NSTS data integrity is the responsibility of the licensees.

Success

Completion of the NSTS Data Integrity Team charter will consist of tracking progress and resolution of all currently identified data discrepancies.

Planned activities include:

- 1) Prepare source inventory reports and analyze for errors (currently in progress)
- 2) Contact licensees and inform them of the data discrepancies for their review. Schedule and conduct a subsequent contact with the licensees (within five days) to resolve the data discrepancies.
- 3) Based on received licensee documentation, correct the NSTS database.
- 4) Provide user-friendly tools during licensee contacts to initiate subscription for on-line NSTS access.

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