Appendix B-17 Question 15

PRIORITIZATION METHODOLOGY FOR INCREASED CONTROLS
STP-05-079

The Texas Radiation Control Program used the following specific factors when prioritizing licensees for inspection for implementation of Increased Controls.

1. Based on the routine inspection interval, licensees assigned a one year interval automatically were prioritized as being inspected for Increased Controls during the first year. The following factors were considered for licensees with routine inspection intervals other than one year. If none of the following factors applied, those licensees were assigned the three year interval for inspection of Increased Controls.

   The first year Increased Control inspections include Industrial Radiography licensees, some Well Logging operations and those licensees who met one or more of the following factors.

2. Possession limits in quantities of concern were determined by the Radioactive Materials Group, Licensing Branch.

3. Prior inspections with Severity Levels I, II or III violations relating to Texas Administrative Code §289.202(y)(1) and (2), Security and Control of Licensed Sources of Radiation, were considered for the time period starting from September 11, 2001 (9/11) through the present.

4. Prior inspections which resulted in an Order or other Escalated Enforcement were considered for the time period starting from September 11, 2001 (9/11) through the present.

5. A previous inspection with "concerns regarding adequate management control" was defined as follows:

   - Enforcement actions. If none then;
   - Severity Level I, II or III Violation relating to §289.202(y)(1) and (2). If none then;
   - Five or more violations of any severity level.

6. An incident related to loss of control of material.

7. Any other reason deemed pertinent to a licensee's ability to adequately implement the Increased Controls.