

Comment Resolution for the September 9, 2010 letter from the Massachusetts Radiation Control Program (RCP) (ML102571775) regarding the August 16, 2010, draft IMPEP report

Comment 1: Page 4, Section 2.0

Page 4; Recommendation 8 of the report states “the second case work certificate (MA-8154-D-803-B) has not been reissued. This recommendation remains open with respect to the reissuance of registration certificate MA-8154-D-803-B with complete text and has been modified accordingly. The review team recommends that the Commonwealth re-issue registration certificate MA-8154-D-803-B with the complete text.” Please see our response to Recommendation 9.”

Response 1:

We find your alternative way of including the complete text by attaching an electronic image of the original certificate in the file acceptable. The report has been modified to allow an “equivalent form” instead of the complete text when re-issuing certificate MA-8154-D-803-B.

Comment 2: Page 4, Section 3.0

Page 4, 3rd paragraph, first sentence states “a clerical staffer was reassigned outside of the Unit and a technical staffer who performed part-time licensing/inspection duties was transferred to another unit within the Bureau.” The technical staffer who performed licensing/inspection duties was not transferred to another unit within the Bureau; rather he was transferred to the Massachusetts Environmental Laboratory (MERL) which is within the RCP.

Same section, next paragraph, 5th sentence states “In addition, the Acting Director expressed concern that the current staff will be tasked with additional duties, such as performing environmental sample analyses for the Pilgrim nuclear power plant groundwater contamination issue, and performing 274i security inspections, among other issues.” We believe the statements made by the Acting Director have been taken out of context in that he was expressing the increasing workload that the remaining Materials Unit staff are faced with following the transfer of one unit member to the MERL and the need to continue to perform Increased Control inspections.

Response 2:

Thank you for providing these clarifications. The report has been changed accordingly.

Comment 3: Page 6, Section 3.2

Page 6, 1st paragraph (continues from Page 5). We would like to comment that the overdue initial inspections were identified by the staff of the Radioactive Materials Unit and addressed during the review period, resulting in no initial inspections being overdue at the time of the IMPEP review.

Response 3:

Thank you for providing this clarification. The statement (that Program Managers were unaware of overdue inspections until they prepared the response to the IMPEP Questionnaire) has been stricken from the report.